

ISSUE 3: HOUSING PROVISION (POLICY 3); HOUSING MIX AND QUALITY (POLICY 21); AFFORDABLE HOUSING (POLICY 22); DENSITY (POLICY 23) AND PROVISION FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE (POLICIES 24 AND 25)

- 3.1 Does the figure of 6,825 dwellings (325 dwgs a year) for the period 2011-32 accurately reflect the full objectively-assessed need for market and affordable housing? Is the figure based on up-to-date and reliable evidence?**
- 3.1.1 Yes. The Council has worked with its partner local authorities to assess housing needs across the Sussex Coast Housing Market Area (CD09/5 and CD08/3). Following the advice in Planning Practice Guidance (PPG), it has sought to update this to take account of new Household Projections, commissioning an update to take account of 2012-based Household Projections (CD08/2) and latterly 2014-based Household Projections (CD08/1). CD08/1 provides the latest evidence, and sought to take into account what remain the latest official household projections, as well as consultation responses to the pre-submission plan.
- 3.1.2 CD08/1 shows that the 2014-based Household Projections indicate a need for 294 dwellings per annum. Sensitivity analysis showed that this sat within the range shown by longer-term migration trends (265 - 305 dpa). Within this, household formation amongst younger households 25-34 is higher than for many areas across the South East, and is set to improve. The evidence concludes that the 2014-based Household Projections, updated to take account of 2015 Mid-Year Population Estimates, provide a reliable assessment of the demographic need – for 294 dpa.
- 3.1.3 Taking account of expected changes in the demographic structure and economic participation, CD08/1 shows that the 2014-based Household Projections would support growth in labour supply of 282 persons pa. Comparing this to economic trends and forecasts, it concludes that there is not a need to adjust upwards the OAN to support the economy.
- 3.1.4 However the analysis does point towards affordability constraints, based on up-to-date analysis of market signals, and CD08/2 showed a substantial level of affordable housing need, for 233 affordable homes per annum.
- 3.1.5 CD08/1 identifies that the housing need arising from the demographic projections, at 294 dpa, would if delivered represent a very significant boost to housing supply relative to past completions of 137 dpa. The Study however goes on to recommend an upward adjustment of 10% to the demographic need to further boost delivery of market and affordable

housing, and improve affordability. It therefore concludes that the full objectively assessed need for market and affordable housing in the District is of 325 dwellings per annum.

3.1.6 REP 61 (Boyer Planning on behalf of Hyde New Homes) have reviewed the Objectively Assessed Needs (OAN) Update 2016 (CD01/1). In summary, it concludes that the OAN of 325 dpa does not accurately reflect the full OAN for market and affordable housing. The OAN should be higher due to the continued suppression of household formation rates for 25-34 year olds, the higher number of affordable homes needed and affordability issues in Adur. An uplift of 15% is appropriate resulting in an OAN of 338 dpa. However, based on proposed LPEG methodology, the uplift could be as high as 25% resulting in an OAN of 368 DPA.

3.1.7 The Council's consultant (GL Hearn) will respond verbally to this representation at the hearing session.

3.2 Having identified the need for housing over the plan period (6,825 dwellings), has the Council undertaken the appropriate assessments in order to justify its conclusion that the District cannot meet all that need (or a greater proportion than the 3,609 dwellings proposed) within its own boundary. Have those sites identified in the SHLAA, that were rejected by the Council, been appropriately assessed? (see also question 7.1).

3.2.1 Every site that that has been put forward by a developer during the production of the Adur Local Plan has been assessed in the Sustainability Appraisal (SA) of the Local Plan (CD07/2). These site options appraisals can be found in Appendix III of the SA and sites that have scored particularly negatively through this process have not been allocated in the Local Plan.

3.2.2 There are generally two main reasons that sites have scored negatively and not been allocated in the Plan - flood risk and landscape issues.

3.2.3 Decisions on flood risk have been informed by a number of studies including the level 1 and 2 Strategic Flood Risk Assessment (CD15/1) and the Lancing Surface Water Management Plan (CD15/3) as well as representations received from flood risk experts, including the Environment Agency and West Sussex County (as the Lead Local Flood Authority). The approach to flood risk is set out in the Council's Flood Risk Topic Paper (CD07/15). Two sites have not been allocated on flood risk grounds - Old Salts Farm and New Salts Farm in Lancing. The reasons for this are set out in appendix 2 of the Flood Risk Topic Paper. A particularly important

piece of evidence is the Lancing Surface Water Management Plan (SWMP), completed at the end of 2015, which found that within the West Beach area (this area is primarily comprised of the residential estate south of Old Salts Farm and New Salts Farm), groundwater levels in the chalk aquifer are significantly influenced by the tide and high tides may cause groundwater to back up and maintain high groundwater levels. The SWMP also states that the Old Salts Farm area is associated with widespread waterlogged ground which is further evidence of emerging groundwater and that there is strong circumstantial evidence that there are more permeable windows in the superficial deposits in the West Beach area that may allow Chalk groundwater to impact groundwater levels in the area. High groundwater levels mean that water cannot drain away after heavy rainfall events.

3.2.4 With regard to landscape/local green gap issues, the following documents are key pieces of evidence that have informed the site options appraisals in the Sustainability Appraisal:

- Landscape and Ecological Survey of Key Sites within the Adur District (2012) (CD14/2) and Technical Annex (CD14/2A)
- Adur Landscape Study Update (2016) (CD14/9)
- Assessment of Landscape Sensitivity (2016) (CD14/10) N.B. This study updated the Technical Annex of CD14/2
- Adur Landscape Study Update - New Monks Farm (2016) (CD14/11)
- Adur Landscape Study Update - Shoreham Gateway (2016) (CD14/12)

3.2.5 Since the site options appraisals were undertaken, the following study has been produced:

- Adur Landscape Study Update - New Salts Farm (2016) (CD14/22)

3.2.6 Three sites have not been allocated on landscape grounds - Shoreham Gateway, Mill Hill (Shoreham) and New Salts Farm (which was also excluded on flood risk grounds - see above). The reasons are set out in the site options appraisals in the SA but are explored in greater detail below in response to the site promoters' statements to the Planning Inspector. Please see also the Council's responses to Issue 1 (Spatial Strategy) and Issue 7 (Countryside, Coast and Local Green Gaps).

New Salts Farm

3.2.7 Boyer's representation (ID15) on behalf of Hyde New Homes, which seeks to justify development on an omission site known as New Salts Farm to the east of Lancing, criticises the evidence on which the strategic site selection

process has been based in terms of landscape and flood risk criteria. The evidence for landscape and visual sensitivity which has informed the Council's spatial planning policies is contained within the Assessment of Landscape Sensitivity for the Adur Local Plan Area (CD14/10) and the Adur Landscape Study Update (CD14/9). Additional assessment work has been undertaken to analyse the potential landscape and visual impacts of specific development proposals, including the omission site at New Salts Farm (CD14/22).

- 3.2.8 An earlier study (Landscape and Ecological Surveys of Key Sites within Adur District, 2012) (CD14/2) took a positive approach to testing the landscape and ecological impacts that could be expected to arise if development were to take place on six sites that had been put forward by developers (including land at New Salts Farm). It should be noted that this work did not incorporate a formal assessment of the impact of development on the Local Green Gap and that, as the Council's policy approach has been developed, issues of coalescence and the contribution to the landscape settings of the settlements bordering the gaps have become more a significant consideration and this analysis has been developed in the 2016 Adur Landscape Study Update (CD14/9).
- 3.2.9 The Council's response to Boyer's criticism of the landscape evidence is set out below:
- 3.2.10 **Soundness and appropriateness of the methodology, approach and criteria used** – The New Salts Farm Report (CD14/22) is a broad landscape and visual appraisal of development proposals and is not a formal landscape and visual impact assessment. It refers to the methods set out in the Guidelines for Landscape and Visual Assessment, 3rd edition, 2013 (GLVIA3) in terms of assessment of potential effects on landscape setting and assessment of potential visual effects and applies these in a way that is appropriate to assessment of a concept masterplan for development which is outside the requirements of the EIA Directive and Regulations (Directive 2011/92/EU). The methodology has been tailored to respond to the specific policies in the emerging Adur Local Plan and so there is a strong focus on potential impacts of development on the Lancing-Shoreham Local Green Gap.
- 3.2.11 There is a strong emphasis throughout GLVIA3 on the need for an approach that is *proportionate to the project that is being assessed and the nature of its likely effects* (concluding point in the Summary Advice on Good Practice to part 1 of GLVIA3). Indeed, para 1.11 in GLVIA describes how its guidance may be applicable in the appraisal of development proposals which raise concerns about potential effects on landscape and visual

amenity. It explains that GLVIA3 is principally concerned with formal requirements of EIA and the role LVIA plays in that process, but suggests that *the methods described will also be useful in such situations*. The methodology used in the New Salts Farm Report (CD14/22), which applies the basic GLVIA3 principles in terms of establishing a baseline (landscape character and sensitivity studies) and identifying the nature of potential landscape and visual effects is considered to be appropriate for the assessment of development proposals that are at a concept design stage and which are not the subject of a formal planning application.

- 3.2.12 **Assessment of significance** – The New Salts Farm report (CD14/22) is a broad landscape and visual appraisal of development proposals which does not incorporate the formal assessment of the significance of predicted landscape and visual effects that would be included within a formal LVIA. As explained above, the methodology used has been tailored to suit the status of the development project being assessed.
- 3.2.13 **Landscape sensitivity** – The assessment of overall (or inherent) landscape sensitivity that is set out in the Assessment of Landscape Sensitivity for the Adur Local Plan Area (CD14/10) provides a strategic assessment of landscape sensitivity to change without prejudging the type of change that might occur. GLVIA acknowledges that assessments of overall landscape sensitivity *may provide useful preliminary background information* and it is considered appropriate that the assessment of local landscape character and sensitivity contained in CD14/10 is used to inform the broad landscape and visual appraisal of development proposals at New Salts Farm, which is not part of a formal EIA process. It should be noted that the landscape sensitivity classifications used in this report were part of the assessment of landscape value, which was also informed by relevant environmental designations and planning policy designations (13 and 14), which recognise the importance of distinctive landscape character within areas of countryside outside the built-up areas and the value of the remaining open undeveloped land between the south coast settlements in conserving the landscape setting of those settlements and preventing their coalescence.
- 3.2.14 **Assessment of visual effects** The broad zone of visual influence identified on Figure 10 in the New Salts Farm report (CD14/22) provides a reasonable estimate of the area over which a residential development of 2-3 storey buildings would be visible. The viewpoint analysis indicates that development at New Salts Farm would intrude within the open, undeveloped character of the Lancing-Shoreham Gap, reducing its perceived extent in views from local roads and public rights of way and increasing the degree of actual and perceived coalescence between the

existing Hasler Estate, the linear development along New Salts Farm Road, the commercial development at Shoreham Airport and the Shoreham Beach settlement to the south of the A259.

- 3.2.15 **Consistency of approach** – Boyer’s representation (paras 2.22 – 2.26) provides a detailed comparison between the 2012 study (Landscape and Ecological Surveys of Key Sites within Adur District, 2012) (CD14/2) and the 2016 New Salts Farm report (CD14/22). It is important to note that the objective of the 2012 study was to assess the extent to which development might be accommodated and the landscape and ecological issues that could be expected to arise. This early work did not consider the impact of development on the Local Green Gap. However, as the Council’s work on policy formulation has developed, issues of coalescence and the contribution of the landscape settings of the settlements bordering the district’s two remaining undeveloped Local Green Gaps have become more significant considerations and so this analysis has been developed in the 2016 Adur Landscape Study Update.
- 3.2.16 It should be noted that landscape was just one of the matters to be taken into consideration in determining the strategic allocations in the Submission Adur Local Plan (CD07/1). Of the six sites assessed in the 2012 study (CD14/2), four were allocated. Appendix III of the Sustainability Appraisal of the Adur Local Plan provides more information as to why certain sites were selected and why others were not.
- 3.2.17 Boyer’s representation compares the appraisal of potential landscape and visual effects undertaken for development proposals at New Salts Farm (CD14/22) and New Monks Farm (CD14/11). The same methodology was applied in both studies and in neither case was there any attempt to produce a quantifiable level of harm and significance or indeed any form of ranking. Each potential development is assessed on its merits and at a comparable, though very basic, level of detail. These appraisal studies have been used to inform pre-application discussions with developers. Given the very early stage of design development, the suggested opportunities for mitigation are indicative. For instance, the text describing the scope to mitigate predicted landscape and visual effects acknowledges that a reduced development footprint at New Salts Farm, in combination with strategically sited and sufficiently broad retained areas of countryside alongside New Salts Farm Road and to the south of the railway, could mitigate the predicted adverse landscape and visual effects. However, the scale of the open spaces shown on the concept masterplan that has been presented by the developer and assessed in this study is not considered to be sufficiently extensive to achieve the necessary level of mitigation; specifically areas of built development/road infrastructure are shown

alongside and close to New Salts Farm Road, to the extent that this road and the existing linear development along it, would be perceived as the new edge of the gap in local views. The key issue here is coalescence. Although, as the appraisal studies demonstrate, it may be possible to mitigate the *landscape and visual impacts* of built development, it is not considered possible to mitigate *coalescence*, as such development would extend the built form into the open gap areas.

- 3.2.18 **Application of landscape evidence in the Local Green Gaps Topic Paper, 2016** (CD07/14). Referring to the Council's contention (in paragraph 6.5 of the Topic Paper) that, with the strategic allocations in place, the gaps would *still function as gaps and still provide the necessary separation to retain the separate identities of the relevant settlements within the Local Plan area*, Boyer's representation states (para 2.49) that *neither of the landscape studies nor the Topic Paper itself describe, identify or quantify what the necessary separation required is in real or physical terms*.
- 3.2.19 This statement is misleading because the Adur Landscape Study Update (CD14/9) specifically addresses this issue. It describes the landscape setting of a settlement as *an integral component of its individual character and identity. It follows that the Local Green Gap is the area required to provide an effective landscape setting for the settlements on either side of the gap.*" Page 6 Adur Landscape Study Update 2016. (CD 14/9).
- 3.2.20 The Adur Landscape Study Update (CD14/9) analyses and defines the broad landscape settings of the settlements which border the gaps based on the zones of visual influence of accessible local views and the character of the 'landscape edges' which structure the way we perceive the landscape in views from the principal gateway approaches via roads and the railway and from publicly accessible footpaths and viewpoints. The report acknowledges that the landscape setting of a settlement cannot easily be measured but, taking the analysis of the Lancing-Shoreham Gap as an example, Section 2 describes how the 'landscape edges' can be shown to define the broad landscape settings for Lancing and Shoreham-by-Sea (illustrated on Figure 8) and thus the minimum land-take that is required to retain their separate identities. As Figure 8 demonstrates, there is an extensive overlap between the landscape settings of Lancing and Shoreham in the centre of the Lancing-Shoreham Gap; it is this central area, where the landscape settings overlap, that is considered critically important to provide the 'necessary separation' required to retain and protect the separate identities of these two settlements. Section 2.2 states:

While the Lancing-Shoreham Gap clearly does provide a critically important visual break between these settlements, these views, and the continuous

urban edge along the coast, suggest that the gap is already critically narrow. There is a risk that further development within the gap, in addition to that allocated in the Proposed Submission Adur Local Plan, would contribute to the coalescence of Lancing and Shoreham-by-Sea.

- 3.2.21 It should be noted that the Council contacted the owners of the New Salts Farm site (at that time Taylor Wimpey) by letter in 2013 and early 2014 requesting further information regarding mitigation of landscape and ecological impacts as well as flood risk but this information was not forthcoming until Hyde Housing's response (Representation No.61) to the Amendments to the Proposed Submission Adur Local Plan (2016) (CD06/01) publication.

Old Salts Farm

- 3.2.22 The response to the Inspector's question from Landstone Ltd. (REP-017-001) which promotes development on land at Old Salts Farm states that there are no constraints to developing the Old Salts Farm site from a landscape point of view.
- 3.2.23 The Assessment of Landscape Sensitivity for the Adur Local Plan Area (Sheils Flynn 2016) (CD14/10) shows that the Old Salts Farm area is within local landscape character areas (LSG Area 7 and 8) which are classified as medium and medium-low overall landscape sensitivity respectively. It is certainly the case that this part of the Lancing-Shoreham Gap has fewer landscape and visual constraints to development than other, more visible areas. However, the Landscape Sensitivity study highlights the following key characteristics that should be conserved and reinforced within any future development scheme:
- *LSG LCA 8 - Old Salts Farm Fringe:*
 - *Large groups of mature trees on railway embankment, the edge of Old Salts Nursery to the north [which] cumulatively create a distinctly wooded character (in views across the Gap) and a strong sense of enclosure*
 - *Old Salts Farmhouse, a Grade II Listed Building to the east of the LCA, has a more ordered landscape setting, with some open views eastwards across adjacent farmland to New Salts Farm.*
 - *LSG LCA 7 - Hasler Fringe:*
 - *Woodland on the fringes of the Hasler estate and groups of mature trees/scrub cumulatively create a distinctly wooded character (in views across the Gap) and a strong sense of enclosure.*
- 3.2.24 The commentary for both of these local landscape character areas highlights the relatively degraded condition of these landscapes and their potential for enhancement. The landscape work undertaken by Sheils Flynn (Landscape and Ecological Surveys of Key Sites within the Adur District 2012) (CD14/2) tested the scope for development in this area and Figure 14f shows indicative principles for development which reinforce its distinctive, enclosed landscape character and improve its green infrastructure value.
- 3.2.25 The landscape evidence demonstrates that Old Salts Farm does have some constraints to development in landscape terms, but it shows that these could be accommodated within a sensitively designed scheme. As noted in the Landstone response, the key constraint, which has prevented

the allocation of this site within the Submission Adur Local plan is flooding and not landscape.

- 3.2.26 It should be noted that the Council contacted the owners of the Old Salts Farm site, Landstone Ltd. by letter in 2013 and early 2014 requesting further information regarding mitigation of flood risk, landscape and ecological impacts but this information was not forthcoming.

Shoreham Gateway / Land at Steyning Road

- 3.2.27 ECE Planning's response to the Planning Inspector on behalf of Cobbetts Developments Ltd (REP-034-001) promotes the inclusion of a residential development on Land at Steyning Road, Shoreham (also known as Shoreham Gateway). This is an omission site which has not been allocated in the Submission Adur Local Plan (CD07/1). ECE Planning considers that Adur District Council *has been too sensitive towards the perceived landscape impact of the site and a recalibration in the assessment of sites should have been undertaken to enable the housing need to be more fully met in the ALP (ECE Planning rep. page 7)*. ECE Planning seeks an amendment to the Built-up Area Boundary in this location so that the Land at Steyning Road can be allocated for residential development.

- 3.2.28 The relevant evidence relating to landscape and visual issues for the Land at Steyning site is summarised in a report by Sheils Flynn – Adur Landscape Study Update – Shoreham Gateway, 2016 (CD14/12). However, it should be noted that the development footprint referred to in this report has since been amended (see planning application AWDM/1953/16) and that the Adur Tidal Walls Scheme has also been modified in this location.

- 3.2.29 The Assessment of Landscape Sensitivity for the Adur Local Plan Area (Sheils Flynn 2016) (CD14/10) shows that the Land at Steyning Road site is within a local landscape character area (LSG Area 4) which is classified as medium-high overall landscape sensitivity. The report explains that the landscape of this relatively small landscape character area is vulnerable to change because:

- it is part of the landscape setting for the complex of historic riverside buildings within the Old Shoreham Conservation Area, including the parish church of St Nicolas (Grade 1 listed) and the Shoreham Tollbridge (Grade II* listed)
- this part of the River Adur corridor, where the River Adur cuts through the southern ridge of the South Downs, contributes to the landscape

setting of the South Downs National Park, a nationally important landscape

- the River Adur wetlands alongside the site are designated as a SSSI (national importance) and the birds that use the mud and sandflats for feeding and roosting are vulnerable to human disturbance
- it is an important component of the landscape setting of the River Adur and forms the foreground to, and gateway views from, the A27 and A27/A283 junction at the point where the river meets the South Downs. It is a significant part of the sequence of views and spaces on the northern edge of Shoreham and, at a gateway strategic scale, is a component of the wider landscape setting of Lancing
- it is highly visible to recreational walkers and cyclists who use the promoted route (The Downs Link) as a riverside connection between the urban areas on the coast and the South Downs National Park.

3.2.30 The Shoreham Gateway report (CD14/12) includes an analysis of relevant viewpoints, which highlights the potential negative visual impact of development in views from the Downs Link path, the public right of way along the west bank of the River Adur, the historic Shoreham Tollbridge, the public right of way at Mill Hill and elevated viewpoints within the South Downs National Park at Lancing Ring and the Mill Hill Nature Reserve.

3.2.31 It should be noted that the views from the Downs Link footpath (Viewpoint 1) are currently partially screened by the hedgerows alongside the River Adur, but this vegetation will be removed when the new Adur Tidal Walls scheme is implemented and the Downs Link route is diverted to follow the crest of the new flood embankment. This change is considered to increase the visibility of the Land at Steyning Road site, strengthening its role as part of the landscape setting of the River Adur, the settlement of Old Shoreham and the listed buildings of St Nicolas and the Shoreham Tollbridge.

3.2.32 The development proposals for new housing at the land at Steyning Road site anticipate 3 storey buildings, which would be approximately 7m above the height of the new Adur Tidal Walls embankment (depending on existing ground level and the proposed design of the buildings). (However please note that a planning application for this site (AWDM/1953/16) has recently been submitted, which includes 3 and 4 storey elements).

3.2.33 It is noted that the drawings for the Adur Tidal Walls scheme show dense woodland planting on the inner (eastern) side of the new flood defence embankment and, if this form of planting were to be implemented, views across the site could be partially screened. However, space for such planting is limited and it is not yet clear whether it will be feasible to implement woodland planting along the embankment of the Adur Tidal

Walls as there are concerns that such planting may compromise the stability of the embankments. The Environment Agency's online Fluvial Design Guidance makes it clear that:

Trees should not be planted on flood embankments as they accelerate drying out and cracking, and a breach of the bank may result if they are blown down in a storm.

<http://evidence.environment-agency.gov.uk/FCERM/en/FluvialDesignGuide/Chapter9.aspx?pagenum=8>

- 3.2.34 At this stage, the Council assumes that any planting on the new flood defence embankment would be limited to small trees/ shrubs (planted at the base of the flood defence bank) and that the new buildings would be prominent in local views.
- 3.2.35 Section 3.4 of the Shoreham Gateway report considers the potential effects of the Steyning Road development proposals on the Lancing-Shoreham Local Green Gap (including issues of coalescence). The principal predicted effects on the Local Green Gap and the setting of Shoreham are anticipated to be:

Degradation of the distinctive rural character and landscape setting of the River Adur valley at a strategic, gateway location - *The proposed development would transform the character of the River Adur valley, disrupting the natural, functional relationship between river floodplain and valley slope and degrading the visual connection along the river valley between the coastal plain and the Downs.*

Development of the Shoreham Gateway site would extend the built development edge of Shoreham northwards to the A27, making the road bridge and gyratory A27/A283 junction the new perceived 'built edge' of Shoreham and reducing the perceived extent of the Local Green Gap at a point where it is already tightly 'squeezed' by commercial development on the west bank of the river and compromised by the elevated sections of the A27 and A283 as they cross the floodplain. The riverside pastures of the Shoreham Gateway site are an important last green link.

Degradation of the landscape setting of Shoreham as experienced in the gateway approach to the town from the A27/A283 from the north - *The distinctive sequence of views on the approach to Shoreham (from the elevated sections of the A27, and the gyratory road junction to the north of the site) focus on the River Adur and the narrow, flat floodplain alongside the river, set against the steep wooded backdrop of the Mill Hill slopes. Steyning Road, which runs along the break of slope at the edge of the floodplain, is the approach to Shoreham from the north and the parish church of St Nicolas is a landmark at the gateway to the town.*

- 3.2.36 The above comments refer to a different development than that currently proposed (planning application AWDM/1953/16) as the scheme assessed under the Shoreham Gateway Landscape Study included residential and commercial (car showroom) development, but the stated potential effects on the Local Green Gap remain relevant.
- 3.2.37 The Council therefore objects to this proposed amendment to the Built Up Area Boundary on the grounds that it would not comply with Policies 13 and 14 in the Submission Adur Local Plan (CD07/1) because the proposed development at Steyning Road would cause detrimental impacts on landscape character (including the setting of the River Adur) and have an adverse impact on heritage assets.

Mill Hill, Shoreham

- 3.2.38 Savill's response to the Planning Inspector on behalf of Brighton & Hove City Council (REP-031-001) promotes the inclusion of a residential development on Mill Hill, an elevated site on the northern fringes of Shoreham adjacent to the A27. This is an omission site which has not been allocated in the Submission Adur Local Plan (CD07/1) and Savills contends that the site could accommodate a level of development without compromising its landscape character and that of the surrounding area.
- 3.2.39 The Council's response has been set out in its letter to Savills dated 19 October 2016 and included within Appendix B to Savills' representation.
- 3.2.40 The Assessment of Landscape Sensitivity for the Adur Local Plan Area (Sheils Flynn 2016) (CD14/10) shows that the Mill Hill site is within local landscape character area (LSG Area 9) which is classified as high overall landscape sensitivity. This 'high' rating reflects the importance of this site in contributing to the landscape setting of Shoreham and its exceptionally high visibility in local views from the South Downs National Park and the Lancing-Shoreham Local Green Gap. The report includes the following section which describes the contribution that the Mill Hill site makes to the landscape setting of Shoreham:

This open grassy slope is perceived as the lower flank of Mill Hill at the only point where an undeveloped part of the Downs extends across the A27 and down into the settlement of Old Shoreham. This field makes a critical contribution to the landscape setting of Shoreham and to the overall sense of undeveloped green space in the Lancing-Shoreham Gap. It makes a valuable visual connection between the Downs and the urban area of Shoreham, 'anchoring' the town within its wider landscape setting.

If the urban area were to extend across the Mill Hill Slopes, the A27 would mark the interface between urban development and countryside in longer views from the Downs. In such circumstances, the A27 would be perceived as a poor quality, abrupt visual boundary to the SDNP (page 34).

- 3.2.41 The visibility analysis of the Lancing-Shoreham Gap in the Landscape Sensitivity Assessment (CD14/10) shows that the Mill Hill site is prominent in views from Lancing Ring (Viewpoint 8), the riverside paths along the River Adur (eg Viewpoint 12) and the historic Shoreham Tollbridge (Viewpoint 14). It is also visible as part of the 'green South Downs' backdrop to Shoreham in views from within the Lancing-Shoreham Gap, including from Shoreham Airport and New Salts Farm Road.
- 3.2.42 The Council contends that the area of development shown on the Fabrik plan would be visible in multiple sensitive viewpoints and that it would detract from the landscape settings of Shoreham and the South Downs National Park. It therefore does not accept that the proposals submitted for development at Mill Hill are appropriate because such development would not comply with Policies 13 and 14 in the Submission Adur Local Plan (CD07/1). The reasons for this decision are set out in the Council's letter to Savills and so are not repeated here.

Transport issues:

Further to the letter sent by Adur District Council to Savill's on 19th October 2016 regarding landscape and transport issues relating to the site, comments from WSCC on these transport matters were forwarded by Adur District Council to Savills on 31st October. In response, a report by Bellamy Roberts was submitted as part of Savill's response to the Inspector's Issues (REP-031-001C). It remains the case that design solutions will need to be demonstrated to provide safe and deliverable access. Furthermore the site is not included in the Council's strategic transport work (eg CD12/4C) and therefore the cumulative residual impact has not yet been demonstrated. Should this site, in addition to others, be added into the Local Plan, this may be necessary and may require further junction mitigation.

West Sompting Allocation (Policy 6)

- 3.2.43 Although land has been allocated at West Sompting (See the Council's response to Issue 4), the response by Persimmon (REP-26-001) to question 3.2 suggests that Adur's proposed housing target is too low and that there is potential to increase the capacity of the West Sompting strategic allocation by means of a review of the existing boundary of this site.

- 3.2.44 In response, the Council justifies the existing boundary of the West Sompting allocation in terms of the strong need to protect and enhance the remaining area of open countryside and green space between the principal settlements of Worthing and Lancing, which are a critically important component of the landscape setting of these towns, contributing to their individual, distinctive character and local identity. Paragraph 151 of the NPPF (CD01/1) states that Local Plans should be prepared with the objective of contributing to the achievement of sustainable development. The NPPF's definition of sustainable development has three dimensions: economic, social and environmental. The Council considers that its approach of seeking to achieve a balance between meeting needs for development, and seeking to manage land uses outside the Built Up Area Boundary, protection and enhancement of countryside and landscape character, and seeking to avoid the coalescence (and therefore loss of individual distinctive character) of settlements within the Adur Local Plan area, is consistent with this definition.
- 3.2.45 The area of undeveloped land that is required to provide the landscape setting for the towns that border the Lancing-Shoreham Gap is defined in the Adur Landscape Study Update (Sheils Flynn, 2016) (CD14/9) and informed by detailed analysis of the distinctive landscape character and sensitivity of the countryside within the gap which is provided by the Assessment of Landscape Sensitivity for the Adur Local Plan Area (Sheils Flynn 2016) (CD14/10).
- 3.2.46 The Built Up Area Boundary (which incorporates the boundary of the West Sompting allocation) has been drawn in response to these studies and in a way that aligns with physical features which can be easily identified 'on the ground' such as roads, hedges, field boundaries and existing property lines. In particular it has been informed by:
- The detailed assessments of the visibility of the Lancing-Worthing Local Green Gap in sensitive views from the South Downs National Park (Figure 12 in the Landscape Study Update) (CD14/9), which demonstrate that the West Sompting site is less visible than other parts of the Worthing-Sompting Local Green Gap. The areas that are defined as providing the distinctive landscape settings for the settlements that border the Worthing-Sompting Local Green Gap. Figure 13 in the Landscape Study Update (DC14/9) shows that the West Sompting site is within the small part of the gap that is defined as forming the landscape setting to just one of the three settlements. As such, it is marginally less critical to the integrity of the Local Green Gap than other parts of the gap.

- The objective of avoiding coalescence between settlements of Lancing/Sompting, Worthing and Sompting Village.
- The sensitive landscape setting of the historic Sompting Village, which forms the Sompting Conservation Area.
- The characteristics and features that define the distinctive local landscapes within the Local Green Gap, in particular the open expansive character of the landscape in the centre of the gap and the existing patterns of field hedgerows and tree clumps which form the 'landscape edges' that contain and define the landscape settings of Worthing, Sompting/Lancing and Sompting village (ref Figure 13 in the Landscape Study Update) (CD14/9).

3.2.47 The boundary of the West Sompting strategic allocation has been carefully drawn to balance these objectives and, in accordance with the objectives of the NPPF, to achieve a sustainable development. The Council therefore does not consider that an amendment to the Built Up Area Boundary is appropriate or justified.

SHLAA Sites

3.2.48 Representation 021-001 (CPRE) and REP 71 (Home Builders Federation) have both suggested a number of sites identified in the Strategic Housing Land Availability Assessment that could have potential for residential development. These sites fall within the Built Up Area Boundary and have been addressed in the Council's response to Question 3.3.

Overall Conclusion

3.2.49 The Council considers that spatial strategy as set out in Policy 2 of the Submission Adur Local Plan is correct; that all sites, including those not included within the plan have been appropriately assessed; and this assessment has continued throughout the plan-making process.

3.2.50 Should any sites additional to those already within the Plan be considered for inclusion, it may be necessary to carry out further transport assessment, particularly where dwelling numbers exceed 'Scenario B' as tested in the Adur Local Plan and Shoreham Transport Study (CD12/1).

3.3 Has an adequate assessment of potential brownfield development sites been undertaken?

3.3.1 The Council has a long history of seeking to identify brownfield sites for their development potential. Given the compact nature of Adur, in 2004 the

entire built up area was surveyed on foot, using aerial photographs and Ordnance Survey maps to identify and plot potential sites.

- 3.3.2 The first Adur Strategic Housing Land Availability Assessment (SHLAA) was published in 2009, building on this survey work. A comprehensive review of all development opportunities was undertaken using a methodology which followed the Communities and Local Government (CLG) guidance in place at that time. The assessment was prepared in consultation with a range of local agents, developers and key stakeholders to identify potential housing sites in Adur.
- 3.3.3 To help inform the emerging Adur Local Plan the SHLAA was reviewed and updated in 2012. It reflected the current circumstances on sites and added new sites that had come forward. This review included a 'call for sites' exercise.
- 3.3.4 In 2014 it was considered appropriate to undertake a more comprehensive review following changes to the planning system nationally. This involved a re-assessment of all existing known sites and two further 'call for sites' exercises which identified new potential development opportunities. The methodology used was based on the guidance in place at the time, together with relevant updates from Planning Practice Guidance: Housing and Economic Land Availability Assessment published in 2014. The methodology was subject to a consultation exercise with key stakeholders. There were no significant concerns raised by stakeholders in response to this consultation. The 'call for sites' exercise provided the opportunity for landowners/developers/agents to submit information to demonstrate that their site was suitable, available and achievable. As with all SHLAAs, the site assessments undertaken by the local authority are based on the best information available at that time. Adur SHLAA 2014 was published in October 2014 (CD04/11).
- 3.3.5 The SHLAA is updated on an annual basis through the Annual Monitoring Report and two further documents have been published - Adur SHLAA Update 2015 (CD06/7) and the Adur SHLAA Update 2016 (CD07/22).
- 3.3.6 The Council encourages potential development sites to be put forward for assessment throughout the year, with the relevant forms and guidance note available on the website.
- 3.3.7 The Council is satisfied that a comprehensive and adequate assessment of the amount of residential development that can realistically be developed on brownfield sites has been undertaken. However, to ensure that "no

stone is left unturned” further work to test the capacity of brownfield sites to accommodate development was undertaken in 2016:

- A further reassessment of all sites which were previously assessed as not being suitable or available for housing and therefore rejected in the SHLAA was undertaken. This assessment can be found in the Adur SHLAA Update 2016 (Table 1) (CD07/22) and the Housing Implementation Strategy 2016 (Appendix 1)(CD/07/23). Of the 48 sites within the Built Up Area Boundary which were rejected as being either not suitable or available for housing, just one has been reassessed as having development potential (SHLAA Ref: ADC/037/13). This is a Council owned site and as part of a review of its land holdings is now being considered for development (see below).
- Those sites that had been assessed as being suitable for residential development but were not currently available (Rejected Sites-Monitor) have also been reassessed to update their SHLAA status in terms of availability and to identify and consider how potential barriers to development can be overcome. This assessment can be found in the Adur SHLAA Update 2016 (Table 2)(CD07/22) and the Housing Implementation Strategy 2016 (Appendix 2)(CD/07/23).
- An Asset Review of Council owned sites is currently being undertaken by Adur District Council; this work is on-going and further sites may come forward in the future. Those sites to date which have been identified as having potential can be found in the Adur SHLAA Update 2016 (Table 3) (CD07/22). A total of 11 sites have been identified, of which 8 sites have the potential to deliver 154 (net) new homes. The redevelopment of these sites would form part of a Neighbourhood Renewal Programme as the sites are held in the Housing Revenue Account (HRA) and the focus will be to deliver additional affordable housing and improve the quality of Adur’s housing stock. Representation 021-001 (CPRE) suggests that there is unconsidered potential for developing Starter Home flats and studio accommodation over several uncovered car parks adjoining local retail or railway provision and the Shoreham Centre. The Council’s Asset Review is currently reviewing the potential of redeveloping existing car parks although this review will not be completed until later in the year.
- Employment Land Review 2014 (CD10/1) – as a part of this review all employment areas within Adur were surveyed. The report concluded that the supply of land and premises for employment is very tight and that there was no quantitative case for the release of employment land for other uses. The amount of employment floorspace that can be

delivered on the local plan area over the Plan period is likely to be significantly lower than the forecast demand due to the limited capacity and environmental constraints of Adur. Excluding the Broad Location at Shoreham Harbour, ten sites were recommended to be retained in employment use; one of these sites (SHLAA Ref: ADC/049/13) has recently been granted planning consent for a residential led mixed use development. However, as part of the exercise to assess all brownfield land for its development potential, the remaining nine employment sites were assessed for their suitability for residential development if their policy protection were to be removed. It concluded that potentially three sites were suitable for residential development. Theoretically, if residential development at a range of densities is considered (40 dph, 50 dph and 100 dph) between 96 and 240 new dwellings could be delivered. By relaxing other constraints such as access issues and poor living conditions, a further site could potentially be suitable for residential development, yielding an additional 76 to 190 dwellings. Therefore, in total, an additional 172 to 430 dwellings could potentially be developed on employment sites. However, whilst this would make a contribution towards meeting the objectively assessed housing need target, this must be balanced against the need for employment floorspace in Adur and the requirement in the NPPF for achieving sustainable development. The full assessment can be found in Appendix 5 of the Housing Topic Paper (CD07/16).

- Open Space Study 2014 (CD20/1) – this study surveyed all of the open space (parks and gardens, natural and semi natural space, amenity green space, provision for children and young people, allotments, cemeteries and churchyards and civic space). The study concluded that there was no overall surplus of open space in Adur. A number of these sites had previously been identified through the SHLAA process; all were assessed as either not suitable or available for housing development. These sites can be found in Table 1 of the SHLAA Update 2016 (CD07/22).

3.3.8 Representation 71(Home Builders Federation) in response to the Strategic Housing Land Availability Assessment 2015 (CD06/7) considers that the Council is unjustified in rejecting many of these sites. The representation states that the reasons for rejecting the following strategic sites needs to be substantiated better:

ADC/106/13 - Land at New Salts Farm Road, Lancing. (Justification for the rejection of this site is detailed in the Council's response to Question 3.2).

ADC/129/13 - Land at Old Salts Farm, Lancing. (Justification for the rejection of this site is detailed in the Council's response to Question 3.2).

ADC/128/13 - Land between Adur Recreation Ground and New Salts Farm Road, Lancing. (This site has been monitored and reassessed - it is no longer available for development. See CD07/22 - Strategic Housing Land Availability Assessment (SHLAA) Update 2016, Table 2).

- 3.3.9 The representation goes on to suggest that more weight is being given to maintaining public open space rather than providing for a larger part of the objectively assessed need. The Council's response is that the Open Space Strategy 2014 (CD20/1) assessed all existing open space and concluded that no overall surplus was identified which could provide opportunities for residential development. Notwithstanding this study, the Council has, through the SHLAA Update (CD07/22 - Table 1) reassessed all rejected sites. It concluded that for the sites specified in the representation:

ADC 078/13 - Land south west corner of Southwick Recreation Ground, Southwick - this Council owned site is not considered suitable and available for residential development. It is adjacent to Southwick Leisure Centre and forms part of the recreation ground. It is heavily treed and whilst it is not laid out as a formal recreation space, it does contain a skateboard area.

ADC/080/13 - Quayside Recreation Ground, Upper Kingston Lane, Shoreham-by-Sea - this site is not available for development. It is used for recreation purposes in conjunction with the adjacent WSCC owned Youth Centre. This, together with the potential for land subsidence, makes the site unsuitable for residential development.

ADC/086/13 - Community Buildings, Pond Road, Shoreham-by-Sea - this site is identified as having potential to deliver 27 dwellings and a planning application is anticipated in 2017.

Conclusion

- 3.3.10 The Council has clearly demonstrated that the evidence base for Adur is based on a rigorous assessment of the capacity of brownfield sites to deliver housing during the Plan period. It has recently reassessed the SHLAA Rejected Sites and Rejected Sites – Monitor, commenced a review of Council owned sites as well as considering a range of other potential sources including employment land and open space typologies. It is confident that “no stone has been left unturned” in respect of identifying potential brownfield development sites within the Local Plan area.

3.4 Does the plan identify a supply of deliverable sites, sufficient to provide five years' worth of housing, with an additional buffer of 5% (or 20% as appropriate)?

3.4.1 The Adur Local Plan identifies a supply of deliverable sites sufficient to provide five years' worth of housing with a 6.1 year supply (with a 5% buffer) or a 5.4 year supply (with a 20% buffer) when measured against the Local Plan capacity based target of 177 dpa. The details and calculations can be found in the Housing Implementation Strategy 2016 (Appendix 5) (CD07/23).

3.4.2 The delivery target of 177 dpa is based on the most up to date monitoring position detailed in the Annual Monitoring Report 2016 (CD21/2) and the Housing Implementation Strategy 2016 (CD07/23).

Determining an appropriate buffer

3.4.3 In determining whether a 5% or 20% buffer is appropriate, Planning Practice Guidance (Housing and Economic Land Availability Assessment - paragraph 035)(CD01/2) advice is that any assessment of local delivery is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle. The Council has taken this advice on board and the detailed evidence can be found in Chapter 4 of the Housing Implementation Strategy (CD07/23). Over the 20 year period for which monitoring data is available (1996 to 2016), the annual average delivery rate has been 108 dwellings (net). Adur has therefore consistently delivered sufficient new homes to meet the target set at that time: 100 dpa (gross) (West Sussex Structure Plan 1989-2006); 99 dpa (net) (West Sussex Structure Plan 2001-2016) and 105 dpa (net) (South East Plan 2006-2026).

3.4.4 REP 034-001 (ECE Planning on behalf of Cobbetts Developments Ltd; REP 017-001 (ECE Planning on behalf of Landstone Ltd) and REP 61 (Boyer on behalf of Hyde New Homes) have cited persistent under delivery of housing since the revocation of the South East Plan in 2013 when measured against both the Objectively Assessed Housing Need figure and the Local Plan housing target figure to justify using a 20% buffer when calculating the five year housing land supply. It is acknowledged that in the last three monitoring years (2013/14 to 2015/16), net housing delivery has been lower than any previous targets set. Indeed, this was predicted in the Annual Monitoring Report 2015 (CD21/1) and is attributed to the downturn of the economy with slower build rates and sites being put on hold during the recession. However, in this regard, delivery in the next 14 years is expected to exceed all previous targets.

- 3.4.5 It is the Council's view that, in calculating the five year housing land supply, a buffer of 5% is appropriate as, when taking a longer term view, there is not considered to be a persistent under delivery against targets set in past Structure and Regional Plans.

Dealing with the under-supply of housing since the base date of the Local Plan.

Using the Adur Local Plan delivery target

- 3.4.6 When determining whether there is a five year housing supply in accordance with paragraph 47 of the NPPF, it is necessary to consider the extent to which there is any shortfall in delivery to date. The Local Plan housing requirement covers the period 2011-2032 and any under-supply up to the most recent monitoring point when measured against requirement must be included as part of the future requirement against which to measure the supply. Since the start of the Local Plan period in 2011, there has clearly been a shortfall in provision against the Local Plans' own annualised housing delivery target of 177 dpa. There are two methods by which to address this shortfall; the Sedgefield approach, which seeks to make up the shortfall within the next five years and the Liverpool approach where the shortfall is spread across the remaining plan period. In this regard, Planning Practice Guidance (Housing and Economic Land Availability Assessment - paragraph 035) advises that any undersupply should be dealt with in the first five years of the plan period where possible.
- 3.4.7 The Sedgefield approach accords with both the Government policy to boost significantly the supply of housing and advice in Planning Practice Guidance (Housing and Economic Land Availability Assessment - paragraph 035). The Council has taken this advice and used the Sedgefield approach to address the shortfall within the first five years.
- 3.4.8 A supply of sites has been identified which are considered deliverable and developable within the five year timeframe 2016-2021 as demonstrated in the housing trajectory included in the Housing Implementation Strategy (CD07/23) and the Annual Monitoring Report (CD21/2). The Council is firmly of the view that the use of a 5% buffer is appropriate. However, to provide a comparison, the five year housing land supply position with a 20% buffer has also been calculated. The trajectory shows that the housing supply is sufficient to meet the Plan's delivery targets for the five year period with either a 5% or a 20% buffer.

- 3.4.9 The five year housing land supply calculations using a 5% and 20% buffer when measured against the Local Plan capacity based housing target of 177 dpa can be found in the Housing Implementation Strategy (Chapter 4)(CD07/23) and the Annual Monitoring Report (Chapter 6) (CD21/2). It demonstrates that sufficient sites have been identified, with a 6.1 and 5.4 year supply respectively over the five year period 2015-2021.

Housing Trajectory

- 3.4.10 REP 034-001 (ECE Planning on behalf of Cobbetts Developments Ltd; REP 017-001 (ECE Planning on behalf of Landstone Ltd) and REP 61 (Boyer on behalf of Hyde New Homes) have also commented on the housing trajectory, suggesting the delivery rates of the two proposed strategic allocations and the broad location at Shoreham Harbour are optimistic, and have provided alternative timescales which would themselves adversely impact on the Council's ability to demonstrate a five year housing land supply.
- 3.4.11 The delivery rates included in the Adur housing trajectory for the proposed strategic allocations have been provided by the site promoters of New Monks Farm (Policy 5) and West Sompting (Policy 6).
- 3.4.12 It should be noted that the delivery rates for New Monks Farm were based on discussions with the site promoter in November 2016 with delivery over a 10 year period between 2018/2019 and 2027/2028 at 65 dpa. However, their representation REP 20-38-001 at paragraph 5.9 includes a table setting out an indicative development timetable for individual elements of the scheme which suggests a faster delivery rate with the residential element of the scheme being completed by April 2025 (with 250 homes being delivered between 2017 and 2020 and a further 350 delivered between 2020 and 2025). This assumes that planning permission is secured in June 2017.
- 3.4.13 In respect of the broad location at Shoreham Harbour, significant progress has been made on a number of sites, and careful consideration was given to delivery rates, taking into account the expiry date of leases and the need to relocate some existing uses. A planning application for approximately 450 dwellings on the site known as Free Wharf is expected in the next two months following two public consultations exercises over the last year. The provision of 400 dwellings on the site is a higher number than expected (260) and reflects higher density and building heights than originally expected.

- 3.4.14 The Council is confident that the delivery timescales reflected in the trajectory are deliverable and robust.

Using the Objectively Assessed Need Target

- 3.4.15 Historically there has never been a strong relationship between housing targets set in Structure and Regional Plans and the need and demand for new dwellings in the Adur local plan area. Previous targets have recognised the limited capacity of the local plan area to accommodate new dwellings in terms of its physical and environmental characteristics – the sea to the south, the South Downs National Park to the north, sensitive strategic gaps (now local green gaps) to prevent coalescence of settlements, flooding and key infrastructure constraints, including transport.
- 3.4.16 Since the revocation of the South East Plan in 2013 and in the absence of an adopted Local Plan, Adur has measured its housing delivery rate against its Objectively Assessed Housing Need figure (OAN) as being the most up to date assessment of housing need. The most recent OAN figure is 325 dpa (Objectively Assessed Housing Need Update 2016– CD08/1).
- 3.4.17 The five year housing land supply calculation using a 5% and 20% buffer demonstrates that the Council does not have a sufficient supply of deliverable sites (3.0 years and 2.4 years respectively) (Housing Implementation Strategy (Chapter 4)(CD07/23) and the Annual Monitoring Report (Chapter 6) (CD21/2) when measured against this target. Given the Council’s view that the OAN cannot be delivered in full in Adur, due to constraints, it is unsurprising that a five year housing land supply cannot be demonstrated when measured against it.
- 3.4.18 It is evident from monitoring information since 1996 that this annual delivery rate of 325 dpa has never been achieved, with 216(net) dwellings being the highest number of dwellings completed in 2006/2007. This is demonstrated in the Housing Implementation Strategy 2016 (Chapter 4, Table 4) (CD07/23).

Conclusion

- 3.4.19 Based on evidence of past delivery rates over a 20 year period, the Council is firmly of the view that the application of a 5% buffer is appropriate when calculating the five year housing land supply. However, a view could be taken that net delivery in the last three years has been lower than any previous target set and a 20% buffer is more appropriate. Notwithstanding the fact that annual delivery in the next 14 years is predicted to be higher than any previous target set, two five year housing land supply tables have

been prepared which demonstrate that the Council does have a five year supply of deliverable sites with either a 5% or 20% buffer when measured against the Local Plan's own delivery target of 177 dpa.

3.5 Does the plan identify a supply of deliverable sites for years 6 to 10 and where possible for years 11 to 15?

3.5.1. The National Planning Policy Framework (paragraph 47) (CD01/1) states that local planning authorities should identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15. To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

3.5.2 Representors (REP 034-001 (ECE Planning on behalf of Cobbetts Developments Ltd; REP 017-001 (ECE Planning on behalf of Landstone Ltd) and REP 61 (Boyer on behalf of Hyde New Homes) argue that further deliverable sites should be allocated to ensure that the plan is flexible to deal with changes over the plan period as it is reliant on the strategic allocations to deliver in the medium to long term. The Council's view is that, in the medium term the strategic allocations at New Monks Farm and West Sompting will continue to deliver sufficient homes, whilst in the medium/longer term the developable sites identified in the broad location at Shoreham Harbour will come forward. This is entirely within the requirements of the NPPF.

Years 6-10 (2021/22 – 2025/26)

3.5.3 The Adur housing trajectory demonstrates that the Plan identifies a supply of deliverable sites for years 6-10 of the plan period. The majority of the housing will be delivered through the proposed strategic allocations at New Monks Farm and West Sompting, together with sites identified within the Shoreham Harbour Broad Location and an assumed amount of windfall development (as discussed in paragraph 2.5 of the Housing Implementation Strategy) (CD07/23). The development of the two strategic allocations will have already commenced by this point in time, giving some certainty to delivery.

New Monks Farm (Policy 5)

3.5.4 The delivery rates included in the trajectory for this development were based on discussions with the site promoter in November 2016 with

delivery over a 10 year period between 2018/2019 and 2027/2028 at 65 dpa.

- 3.5.5. However, their representation REP 20-38-001 at paragraph 5.9 includes a table setting out an indicative development timetable for individual elements of the scheme which suggests a *faster* delivery rate with the residential element of the scheme being completed by April 2025 (with 250 homes being delivered between 2017 and 2020 and a further 350 delivered between 2020 and 2025). (This assumes that planning permission is secured in June 2017).

Land at West Sompting (Policy 6)

- 3.5.6 The delivery rate included in the trajectory for this development has been provided by the site promoter. It indicates that delivery will be over an eight year period between 2017 and 2025 at a rate of 50 to 100 dpa. This is considered realistic and deliverable.

Shoreham Harbour Broad Location

- 3.5.7 In respect of the broad location at Shoreham Harbour (the Western Harbour Arm part of which will be predominantly residential), significant progress has been made on identifying individual development sites, taking into account the expiry date of leases and the need to relocate some existing uses and with careful consideration given to delivery rates. The sites are considered to be developable at the point envisaged. This will be considered in more detail by the emerging Shoreham Harbour Joint Area Action Plan (CD13/14) and a more detailed trajectory will be developed in due course.

Years 11-15 (2026/27 – 2030/31)

- 3.5.8 It has not been possible to identify a sufficient number of developable sites for the latter part of the Plan period. The housing trajectory indicates that the development at New Monks Farm will be completed by 2028 (although see comment above in this respect), and the remaining sites at Shoreham Harbour broad location (Western Harbour Arm) will be completed by 2031. A windfall allowance will also contribute to housing delivery. (see the Council's response to Question 3.7)

Conclusion

- 3.5.9 The Council is confident that the delivery timescales reflected in the trajectory are deliverable. The Adur Local Plan does identify a supply of

deliverable/developable sites for years 6 to 10 when measured against the capacity based target of 177 dpa. It cannot, at this stage, identify sufficient developable sites for years 11-15. This is entirely in accordance with paragraph 47 of the NPPF (CD01/1).

- 3.5.10 It should be noted that the SHLAA Update 2016 (CD07/22) identifies a number of sites that have been assessed as Rejected Sites – Monitor. These sites are in a suitable location for housing development. Appendices 2 and 3 of the Housing Implementation Strategy 2016 (CD07/23) have reassessed these sites and gives details of the actions necessary to make them deliverable. Together they could potentially deliver around 128 new homes if these actions are implemented.

3.6 Should the submitted plan include a housing trajectory?

- 3.6.1 Paragraph 47 of the National Planning Policy Framework (NPPF) (CD01/1) states that local planning authorities should illustrate, both for market and affordable housing, the expected rate of housing delivery through a housing trajectory for the Plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five year supply of housing land to meet their housing target.
- 3.6.2 The Adur Local Plan housing delivery target of 177 dpa is based on the most up to date monitoring position detailed in the Annual Monitoring Report 2016 (CD21/2) and the Housing Implementation Strategy 2016 (CD07/23).
- 3.6.3 A housing trajectory for Adur has been prepared and is included within the Housing Implementation Strategy 2016(CD07/23) and the Annual Monitoring Report 2016 (CD21/2). It takes into account the annualised Local Plan target plus the backlog in past completions since the start of the Local Plan period in 2011. It includes the anticipated delivery of both market and affordable housing over the plan period. It consists of actual completions for the first five years of the Plan period and anticipated delivery from commitments, potential strategic allocations, broad location, sites identified in the Strategic Housing Land Availability Assessment Update (SHLAA) 2016 (CD07/22) as being deliverable and a small sites windfall allowance.
- 3.6.4 However, REP 026-001 (Turley on behalf of Persimmon Homes), REP 017-001 (ECE Planning on behalf of Landstone Ltd) and REP 034-001 (ECE Planning on behalf of Cobbetts Developments Ltd) all state that there should be a housing trajectory in the Adur Local Plan in order to monitor delivery progress.

- 3.6.5 It is the Council's view that the Local Plan document itself does not need to include a housing trajectory. The trajectory is updated on an annual basis and by including it in the Annual Monitoring Report, allows the most up to date position with regard to past completions and future projected completions to be reported.
- 3.6.6 Appendix 5 of the Submission Adur Local Plan 2016 (CD07/1) sets out the monitoring framework with which to gauge the effectiveness of policies and targets to be achieved. It states that the Annual Monitoring Report will monitor local plan policies, assess its performance and indicate whether any changes need to be considered where targets are not being achieved or the required outcomes are not being delivered. It will also include updates of the housing trajectory.

Conclusion

- 3.6.7 The Council does not consider it necessary to include a housing trajectory in the Local Plan document. A trajectory is included within the Annual Monitoring Report which is the document in which the effectiveness of housing policies and targets will be monitored and will consider whether any changes are required if such targets are not being met. Given its annual publication, this can be kept up to date more easily than if the trajectory is located in the Local Plan itself.
- 3.6.8 However, if it is considered necessary to make the Local Plan sound, the Council would not object to including the housing trajectory as an Appendix to the Local Plan.

3.7 Is the calculation of the windfall allowance robust and justified?

- 3.7.1 The National Planning Policy Framework (NPPF) at paragraph 48 (CD01/1) states that local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.
- 3.7.2 Planning Practice Guidance: Housing and economic land availability assessment, at paragraph 024 (CD01/2) states that local planning authorities have the ability to identify broad locations in years 6-15 which could include a windfall allowance.

- 3.7.3 The Council believes that the calculation of the windfall allowance of 32 dwellings per annum, as included in the delivery target set out in Policy 3 of the Submission Adur Local Plan (CD07/1), is robust and justified. The Housing Implementation Strategy 2016 (Appendix 5) (CD07/23) sets out the methodology used, based on the historic delivery rate of small sites (5 dwellings or less) over a nine year monitoring period 2004/05 to 2012/13. It is considered that this is a sufficient period of time over which to calculate a windfall allowance as it takes account of a range of market conditions.
- 3.7.4 Over this nine year period, 22% of the total number of homes delivered in Adur have been on small windfall sites, as evidenced in the Housing Implementation Study 2016 (Table 11, Appendix 5) (CD07/23). These sites comprise infill sites, changes of use and conversion of properties, which are difficult to identify in advance. Garden land has been specifically excluded from the whole of this 9 year monitoring period. These small sites have not been included in the Strategic Housing Land Availability Update 2016 (SHLAA)(CD07/22) as they fall below the SHLAA threshold of sites that can potentially deliver 6+ dwellings. Care has been taken to avoid double counting in order to ensure consistency with NPPF paragraph 48. Monitoring data produced by West Sussex County Council on behalf of all West Sussex local authorities identifies all sites of 6+ dwellings (CD21/3) and these sites have been excluded from the analysis. Current commitments have also been excluded. Paragraph 22 (Table 1) of the Submission Adur Local Plan 2016 (CD07/1) sets out the housing land supply for the Plan period 2011-2031 (MM11 proposes to amend the end date of the Plan to 2032 - CD07/3). Footnote 7 to paragraph 2.18 of the Submission Adur Local Plan 2016 (CD07/1) explains that to avoid any double counting of sites of 5 or less dwellings which currently have planning permission (are committed), a windfall allowance has not been made for the first three years of the five year housing land supply.
- 3.7.5 Given the built up nature of Adur, small infill sites, change of use and conversion of buildings have consistently come forward and make a significant contribution to the overall delivery of dwellings. The windfall delivery rate from change of use/conversion of properties could potentially increase as a result of flexible policies in the NPPF (paragraph 51) (CD1/01) regarding the re-use of redundant buildings and changes to permitted development rights for change of use from office to residential. The Housing Implementation Strategy 2016 (CD07/23) - Table 12) indicates that 60% of all windfall sites come from these sources.
- 3.7.6 REP 71 (The Home Builders Federation) in their representation to the Amendments to the Proposed Submission Adur Local Plan (2016)

(CD06/1) in relation to the windfall allowance, state that, whilst they would normally consider this to represent robust evidence to justify the windfall allowance proposed, as Adur has a very constrained housing land supply, it is considered that an assumption that windfalls will continue to materialise in numbers they have done in the past, even at a discounted rate, may be too confident.

- 3.7.7 The Council does not agree. Advice in PPG: Housing and economic land availability assessment (paragraph 043 - CD01/2) is that the windfall allowance should be monitored to record whether such an allowance is coming forward as expected. Since the windfall allowance was determined in 2013 there have been three monitoring years. As the table below demonstrates, monitoring the windfall allowance over the last three years indicates that the windfall rate remains at an average of 32 dpa thus demonstrating that windfall sites continue to come forward on a consistent basis:

Year	Total windfall delivery	New Build	% of total	Change of use/conversion	% of total
2013/2014	30	12	40%	18	60%
2014/2015	40	21	53%	19	47%
2015/2016	27	13	48%	14	52%
Total	97	46	47%	51	53%

- 3.7.8 The Council will continue to monitor the windfall allowance on an annual basis and this will be reported through the Annual Monitoring Report. If, in future years, sites do not continue to come forward as predicted, the windfall delivery rate will be adjusted accordingly and this will be reflected in subsequent housing trajectories.

Conclusion

- 3.7.9 The Council considers that it is justified to include a windfall allowance of 32 dwellings per annum over the Plan period. The data from windfall completions from previously developed sites over a nine year period provides a robust basis from which to forecast future windfall delivery. Monitoring windfall delivery over the last three years demonstrates that windfall sites have consistently come forward in the local plan area and

there is no evidence to demonstrate this will not continue to provide a reliable source of supply.

3.8 Is there enough flexibility embodied in the Council's approach so that it could react quickly to any unforeseen change in circumstances? (see also question 18.2)

3.8.1 The limited land availability and the significant environmental constraints (see question 7) on the District make any flexibility in the Plan extremely difficult to achieve. The Council has taken a proactive approach to the delivery of new housing and employment floorspace as explained in response to issue 18.1 and 18.2 but there is no fallback position available to the District. However, the Council is confident that it will be able to deliver its spatial strategy given the work undertaken with site promoters/developers and its ability to react to changed circumstances to meet any unexpected delivery issues.

3.9 Has the relationship between economic growth in the District and the provision of new housing been adequately addressed?

3.9.1 Yes, the Council consider that the relationship between economic growth in the District and the provision of new housing has been adequately addressed.

3.9.2 This relationship is set out in paragraphs 7.12-7.21 of the Adur Employment Land Review (GL Hearn, 2014) (CD10/1) and paragraphs 8.10-8.13 of the Employment Topic Paper (CD07/13). The Topic Paper states:

'Using GL Hearn's Autumn 2013 demographic projections and the level of housing provision proposed in the Revised Draft Adur District Local Plan 2013 (which was the current Plan at the time of the production of the ELR), it is estimated that the labour supply within the district will increase by around 700-800 persons (2.6%) between 2011-31.

The Experian economic forecasts indicate a net growth in employment of 5,200 jobs between 2011-31. GL Hearn consider that the Experian forecasts are likely to overestimate economic growth potential over this period. A notable proportion of employment growth is forecast in sectors where population growth is expected to be a demand driver. Therefore population growth is expected to be notably lower than assumed in the Experian econometric model.

However, looking more widely at economic growth potential, the close labour market interactions between Adur District and both Brighton and Hove and Worthing should be considered. There is a net out-commuting from Adur of just under 7,200 persons daily which suggests there is some

potential for economic growth to be supported by changing commuting dynamics, particularly considering the constrained supply of land for development in both Brighton & Hove and Worthing.

On the basis of the available evidence, GL Hearn suggest that the potential growth in jobs in the district is likely to be above the growth in labour supply of around 700-800 persons indicated over this period and thus there is likely to be some reduction in net out-commuting. However, it is probably appropriate to regard the Experian figures for growth of 5,200 jobs between 2011-31 as optimistic and it is expected that employment growth would be more moderate. GL Hearn estimate that employment growth of between 2000 and 4000 jobs (2011-31) is more likely.'

3.9.3 It should be noted that the predicted growth in labour supply will have increased since the ELR was produced in 2014 as it was based on the housing figure of 147 dwellings per annum (as contained in the Revised Draft Adur Local Plan 2013). As per the Submission Adur Local Plan (CD07/1), this figure has now increased to 180 dwellings which will inevitably result in a greater labour supply. While this increase in labour supply is unlikely to be higher than employment growth in Adur over the plan period, it will be likely to have a less beneficial impact on Adur's relatively low jobs density figures (the ratio of jobs to the population aged 16-64, 0.63 in Adur as of 2012 compared to 0.81 on average across the South East) and the current high level of out-commuting (approximately 56% according to the 2011 Census).

3.10 Are the requirements of policy 21: Housing Mix and Quality, reasonable and justified? Has the Council properly addressed the needs of the elderly and people with disabilities?

3.10.1 It is considered that Policy 21 is reasonable and justified. The National Planning Policy Framework (CD01/1) at paragraph 50 encourages local authorities to deliver a wide choice of quality homes by planning for a mix of housing based on current and future demographic trends, market trends and the differing needs of various sectors of the community. The Written Ministerial Statement (Housing Standards Review) (CD01/22) sets out national policy on the setting of technical standards for new dwellings and this, together with the Technical Housing Standards: nationally described space standards (SD01/23) have been taken into account. Based on an up to date evidence base, Policy 21: Housing Mix and Quality, has addressed these requirements.

Housing Mix

3.10.2 The Objectively Assessed Need for Housing: Adur District (2015) (CD08/2) and the Objectively Assessed Housing Need Update 2016 (OAN) (CD08/1) consider the future need for affordable housing, market housing and specialist housing for older people in Adur, based on current and future demographic trends and market trends. The findings from the OAN reports found that the existing housing stock in Adur is focused towards two and three bedroom properties (CD08/2 - page 96, table 38) and that for market housing the demand for different types of homes will be similar to the existing profile of stock with a shift in demand towards smaller homes in the future given that household size is expected to fall slightly, reflecting the ageing population. Evidence indicates that future provision of market housing should be focused on delivering two and three bedroom houses both for younger households and older households wishing to downsize. There is a modest demand for dwellings with four or more bedrooms. (CD08/2 paragraphs 7.12-7.15).

3.10.3 The Coastal West Sussex Strategic Housing Market Assessment Update 2012 (CD09/5 - paragraph 9.41) suggests that the provision of smaller dwellings should be in and around the town centres and Shoreham Harbour although consideration should be given to the provision of one, two and three bedroom homes as part of a higher density development at Shoreham Harbour to enhance the housing offer and support town centre regeneration. Evidence indicates that, across Adur in general, the focus should be on the provision of family housing of two or more bedrooms. It recognises that much of the new development in the built up areas of Adur comes from smaller sites where it is not always possible to provide a mix of dwellings. Taking these findings into account, the OAN Update 2016 (CD08/1) recommends that, within the Local Plan area, future delivery of market housing should reflect the following mix (see MM37 - CD07/4):

- 1-bed properties 5-10%
- 2-bed properties 40-45%
- 3-bed properties 40-45%
- 4-bed properties 5-10%

3.10.4 The OAN also considers that, on strategic sites, this should be the starting point in considering market housing mix. The Council has taken this advice, which is reflected in paragraph 4.29 of the Submission Adur Local Plan (as proposed to be modified by MM35, 36, 37 - CD07/4). (It should be noted that an updated housing mix was included in the Amendments to the Proposed Submission Adur Local Plan (CD06/1) based on evidence in the Objectively Assessed Need for Housing: Adur District 2015 Study (CD08/2). This is superseded by more up to date evidence on housing mix

provided in the Objectively Assessed Housing Need Update 2016 (OAN) (CD08/1) and this is reflected in MM37 (CD07/4)).

- 3.10.5 REP 20-38-001 (DM Stallard on behalf of New Monks Farm Development Ltd) state that it should be acknowledged that the mix in para 4.29 of the Local Plan is district wide and that the mix for individual sites should be considered on a site specific basis. The Council considers that paragraph 4.29 of the Local Plan is sufficiently flexible; it explicitly states that this mix is area wide and should be seen as a starting point in considering housing mix on potential strategic allocations.
- 3.10.6 REP 026-01 (Turley on behalf of Persimmon Homes) Consider the wording of Policy 21 to be too prescriptive and inflexible and should refer to a preferred mix based on local housing need, but allowing for some flexibility so that individual developments can respond to the site circumstances and the current market. Again, the Council disagrees; Policy 21 is intended to provide flexibility by setting out the principles for market housing in accordance with evidence. Paragraph 4.29 explicitly states that the proposed mix is area- wide and should be seen as a *starting point* in considering housing mix on potential strategic allocations. The area wide mix is not included in the policy itself for this very reason. As a result the Council considers that the Plan takes a sufficiently flexible approach to this matter.

Housing for the elderly and those with disabilities

- 3.10.7 In general terms, the needs of older households and those with disabilities for the Coastal West Sussex Authorities were considered in the Coastal West Sussex Strategic Housing Market Update 2012, with Figure 221 (page 233) of that document indicating that a range of illnesses and disabilities is expected to increase, given the ageing population (CD09/5).
- 3.10.8 The OAN Update 2016 (CD08/1 - paragraphs 4.41-4.58) provides further evidence of a growing older population, with a greater proportion of the population in the age groups 65+, and outlines that this will influence both the mix of different sizes of properties needed in Adur as well as the needs for specialist housing and nursing/care home provision. The analysis concludes that there is a potential need for 615 units of specialist accommodation for older persons over the Plan period (29 units per annum).
- 3.10.9 Given that the number of elderly households (and other sectors of the community) are likely to have a need for homes designed to meet their changing needs, and to enable them to live independently for longer,

paragraph 4.30 of the Submission Adur Local Plan 2016 (CD07/1) encourages all new homes to be built to the higher optional Building Regulation Standard M4(2) Accessible and Adaptable Dwellings where possible and where viability is not compromised.

- 3.10.10 The Council considers that Policy 21 properly addressed the needs of older people and people with disabilities. It supports the provision of housing for older people, including registered care homes and specialist accommodation in all tenures. In order to ensure that the mobility and access needs of the growing elderly population are addressed, the optional higher Building Regulations Standard for Accessible and Adaptable dwellings will be applied to relevant appropriate planning applications where feasible and viable.
- 3.10.11 The Whole Plan and Community Infrastructure Levy Viability Assessment 2017 (CD24/11 - paragraphs 1.29, 4.22 and 4.24). The study states *“The construction cost rates adopted are considered to cover the costs of the policy and the adoption of accessible/adaptable dwellings standards.”* (paragraph 4.22)
- 3.10.12 As a result it is considered reasonable and justifiable to seek these higher optional standards.

Housing quality

- 3.10.13 The Council recognises the importance of ensuring that new homes of all tenures should be of a size which provides sufficient internal space for everyday activities. Paragraph 4.30 and 4.30A of the Submission Adur Local Plan (CD07/1) also recognise the need for homes to be designed to meet the changing needs of older people as well as the need for specialist retirement accommodation. Policy 21 is justified in reflecting this by supporting the provision of such housing in the built up area and expecting all new dwellings to meet the national minimum space standards.
- 3.10.14 The Council recognises that some existing older and/or larger homes may have the potential to be converted into flats or maisonettes, thus providing a useful addition of smaller dwellings to the housing stock. It is reasonable and justified for Policy 21 to support the principle of such conversions. The nationally described space standards 2015 does not relate to conversions of buildings. Therefore, to ensure that such conversions provide a satisfactory standard of living accommodation, the policy makes reference to the Supplementary Planning Document “Development Control Standard No 4 - Flat Conversions” (CD18/2) produced by the Council which sets out in detail the required minimum internal and external space standards for

such conversions as well as taking into account the impact on adjoining dwellings and the character of the area.

Protecting the existing housing stock

- 3.10.15 Policy 21 includes a provision to protect the existing housing stock and resist the loss of dwellings to other uses (unless the loss can be justified by facilitating the provision of a community use). Given the limited amount of potential land available for new homes in the built up area, and the fact that the Council is not able to meet the full Objectively Assessed Need for housing, it is considered that it is entirely appropriate and justified to seek to safeguard its existing housing stock in this way.

Conclusion

- 3.10.16 The Council considers that all the requirements of Policy 21: Housing Mix and Quality, are reasonable and justified. It provides support for an appropriate mix of housing which will provide opportunities for older households to downsize, and for new residential development for older people, including specialist retirement accommodation. It promotes the delivery of housing which meets Building Regulations Standard M4 (2) for accessible and adaptable dwellings - where there is an identified need.
- 3.10.17 The policy requirements have been based on up to date evidence of the need and demand for a range of dwelling types and sizes for market housing. It sets out the principles upon which the housing mix for new residential development should be based without being overly prescriptive. The Council recognises that this is an area wide mix and advice on the starting point for the mix of houses to be provided on potential strategic sites is given in the supporting text (at paragraph 4.29) to the policy, rather than in the policy itself, to provide some flexibility on individual sites.

3.11 Does the Plan make appropriate provision for affordable housing in accordance with national policy? Are the proposed percentages, as set out in Policy 22, viable, deliverable and justified?

Does the Plan make appropriate provision for affordable housing in accordance with national policy?

- 3.11.1 The National Planning Policy Framework (NPPF) (CD1/01) enables local authorities to seek affordable housing on suitable sites. Paragraph 50 states that to deliver a wide choice of high quality homes, widen opportunities for homeownership and create sustainable, inclusive mixed communities, local planning authorities should:

- Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.
 - Identify the size, type, tenure and range of housing that is required in particular locations.
 - Where they have identified that affordable housing is needed, set policies for meeting this need on-site (or off-site or financial contribution if this can be robustly justified).
- 3.11.2 REP ID 15 (Boyer on behalf of Hyde New Homes) - consider that as Adur is not meeting its objectively assessed housing need in full, it has not demonstrated that it has made every effort to meet housing need, including affordable housing need, and therefore is not in line with national policy. It states that allocating additional sites will assist in delivering more affordable housing to meet the need.
- 3.11.3 REP 034-001 (ECE Planning on behalf of Cobbetts Developments Limited) and REP 017-001 (ECE Planning on behalf of Landstone Ltd) both state that the plan does not make appropriate provision for affordable housing. Allocating additional sites would aid significantly in this regard.
- 3.11.4 Local housing evidence in Chapter 5 of the Objectively Assessed Need for Housing: Adur Report 2015 (CD08/2) identifies an acute affordable housing need in Adur. This is as a result of a combination of market conditions, barriers to entry, development constraints, low earning bias and the existing social housing stock. To help meet the housing needs of Adur, there therefore needs to be a proactive approach to deliver more affordable homes.
- 3.11.5 The Objectively Assessed Housing Need Update 2016 (CD08/1 paragraphs 5.6-5.8) suggests a need of 294 dpa based on demographic projections. If delivered, this represents a very significant boost to housing supply set against a past completion rate of 137 dpa. It is considered that a further upward adjustment of up to 10% could be justified in seeking to boost the delivery of both market and affordable housing, and improve affordability. This would yield an OAN of 325 dpa. However, land supply in Adur is clearly constrained, reflecting its geography sitting between the South Downs National Park and the sea. The scale of affordable housing need in Adur is substantial and whilst the study states that it would be unrealistic to meet this need in full, there is some basis to adjust upwards the assessed housing need, although this moves beyond demographic projections. Any

upward adjustment to planned housing provision would deliver both market and affordable housing.

- 3.11.6 The Council is unable to meet its full objectively assessed need. The local plan strategy takes account of the compact nature of Adur, and the location of potential strategic sites results in a pattern of growth which maximises sustainability as far as is realistically possible.
- 3.11.7 In a representation to Policy 22 of the Proposed Submission Adur Local Plan 2014 (CD06/1) Representation 3 (National Farmers Union) expressed concern that Policy 22 is inconsistent with NPPF paragraphs 20,21 and 28 in that it is not supporting economic growth or business. It states that dwellings for agricultural workers are a form of affordable housing and it is not appropriate to seek an affordable housing contribution as essentially this would see farm businesses paying twice for affordable housing. A revision is sought to the final line of the policy to include “...with the exception of those demonstrated as being required for rural farmworker and forestry dwellings”.
- 3.11.8 The Council does not agree with the suggested revision to the policy. The provision of affordable housing has been incorporated into the viability testing undertaken in the Adur Whole Plan & Community Infrastructure Levy Viability Assessment 2017 (CD24/11). Therefore, in most circumstances, the Council does not expect viability considerations to reduce the ability of a site to contribute towards affordable housing provision. It is considered that the policy provides sufficient flexibility in that, if genuine and significant economic constraints exist, it clearly gives developers the opportunity to provide robust financial viability evidence (to be independently assessed at the developer's cost) if affordable housing provision requirements cannot be met. In addition, given the character of the Adur Local Plan area it is unlikely that many agricultural workers dwellings will come forward for development.
- 3.11.9 REP (Home Builders Federation) considers the Policy is unsound because it is contrary to national policy in that some of the rates proposed are not supported by evidence. In particular, the Adur Whole Plan and CIL Viability Assessment (2014) paragraph 6.10 shows that development at Shoreham Harbour is not viable and appears unable to sustain any level of affordable housing owing to infrastructure costs. It states that whilst some government funding may be available as well as funding secured from the Local Economic Partnership, it is unclear what proportion of these funds is available to support infrastructure provision and improve the viability of Shoreham Harbour. Therefore, it would be contrary to policy to specify the proposed rates of affordable housing in this strategic allocation.

- 3.11.10 In response, the most recent Adur Whole Plan & Community Infrastructure Levy Viability Assessment 2017 (CD24/11) factors in the affordable housing targets proposed by the Local Plan to determine if they are deliverable and to assess the balance with CIL. It has included a preliminary high level assessment of the Shoreham Harbour Regeneration Area which is allocated as a broad location for development in both the Adur Local Plan and the Brighton & Hove City Plan (Part 1) (adopted in March 2016). This concluded that this regeneration area is capable of being delivered in an economically viable way if, amongst other factors, concessions on affordable housing are made. The Shoreham Harbour Joint Area Action Plan (JAAP) is currently being produced and a separate whole plan viability assessment will be carried out to underpin it. Policy SH4: Housing and Community of the Revised Draft Shoreham Harbour Joint Area Action Plan (CD13/14) (currently made available for consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012), states that provision of new residential development will be expected to provide for a mix of affordable housing in accordance with local plan policies.
- 3.11.11 REP 71 (Home Builders Federation) states that affordable housing obligations are normally calculated on the basis of net additions to the stock and the use of gross dwellings in Policy 22 to calculate affordable housing contributions is unlikely to be effective as a policy.
- 3.11.12 However, the NPPF does not address the issue of using gross or net development calculations for affordable housing contributions. The Council considers that the decision should be taken at the local level and in the light of local circumstances. Policy 22 specifies the use of gross dwellings as the starting point used by Adur District Council when determining the level of affordable housing to be provided on a development site. This approach has been supported at an appeal in Worthing Borough (APP/M3835/A/13/2199960 - 6-8 West Avenue, Worthing) which is appended to this response. Adur & Worthing Councils have a joint officer structure and the District and Borough have similar development characteristics and constraints. Chapter 5 of the Objectively Assessed Need for Housing: Adur Report 2015 (CD08/2) identifies an acute affordable housing need in Adur. The Council considers that this need justifies the use of a gross figure for calculating affordable housing provision. The majority of new housing delivered has been on (often small) redevelopment sites and an approach that maximised the opportunity for affordable housing is considered appropriate.

3.11.13 At paragraph 19 of the attached appeal decision (APP/M3835/A/13/2199960) the Inspector concluded that “ *the NPPF does not state which method of calculation should be used so adopting one rather than another method is not in itself a departure from or an overriding of policy..... the use of gross rather than net housing for the calculation of contributions is consistent with relevant policy.*”

Are the proposed percentages, as set out in Policy 22, viable, deliverable and justified?

3.11.14 REP 034-001 (ECE Planning on behalf of Cobbetts Developments Limited) and REP 017-001 (ECE Planning on behalf of Landstone Ltd) both state that the policy wording is not compliant with changes to NPPF surrounding affordable housing delivery on small sites.

3.11.15 The Written Ministerial Statement on 28th November 2014 (CD01/20) amended Planning Policy Guidance and introduced a small sites affordable housing contributions policy to help boost housing delivery and incentivise brownfield development. It introduced a national threshold of ten units or fewer (and a maximum combined floorspace of no more than 1,000 square metres) beneath which affordable housing contributions should not be sought. The intention is to tackle the disproportionate burden of developer contributions on small scale developers, custom and self-builders and therefore speed up housing delivery.

3.11.16 Adur has a limited amount of land available for new development. The capacity of Adur to accommodate new dwellings is influenced by its physical and environmental characteristics - the sea to the south, the South Downs National Park to the north, flooding and key infrastructure constraints. It relies on infill sites coming forward for development and recognises that smaller housebuilders make a significant contribution to housing delivery. Alongside these constraints to delivery, the Council has a significant need for affordable housing as evidenced in the Objectively Assessed Need for Housing: Adur District Study 2015 (CD08/2).

3.11.17 The Council's published Supplementary Planning Document “Planning Contributions for Infrastructure Provision (2013) (CD24/12) provides the detail to Saved Policy AH3 of the Adur Local Plan 1996 (CD24/11) which seeks to deliver 30% affordable housing on sites of 15 dwellings or more. Since 2000, 1931 (gross) dwellings have been delivered of which just 401 have been affordable dwellings (20.8%).

3.11.18 Policy 22 sets out a ‘sliding scale’ approach to affordable housing delivery. This approach was designed to take account of the fact that many of the

residential development sites coming forward in the past in Adur have been smaller than 15 dwellings and therefore have made no contribution to affordable needs. Smaller sites form a vital component of Adur's housing supply and to support this approach, an analysis of planning applications approved for residential development between 2007 and 2016 has been undertaken which provides further evidence of the contribution that small sites make to the provision of housing. This is demonstrated in Table 1 below which clearly shows that a significant number of small sites of under 10 dwellings contribute to the delivery of housing in Adur:

Table 1: Number of sites delivering dwellings 2007-2016

Number of dwellings	Number of sites
1	116
2	75
3	13
4	17
5	9
6	5
7	0
8	2
9	3
10	3
11	0
12	1
13	2
14	1

15	0
16+	11

- 3.11.19 Given the high level of affordable housing need in Adur, and the significant contribution smaller sites make to housing delivery, it is considered appropriate to seek contributions from smaller developments (10 or less). This approach was discussed and supported by Members at a meeting of the Adur Planning Committee held on 6th July 2015 meeting and it was minuted “that the ‘sliding scale’ policy approach taken in the Proposed Submission Adur Local Plan 2014 be maintained in the next iteration of the Adur Local Plan”.
- 3.11.20 Policy 22 has been viability tested in order to demonstrate that this approach would not deter residential development from coming forward. A range of residential viability tests was undertaken based on the policy target of 30% affordable housing delivery but testing three alternative tenure mix options (set out in paragraph 4.5 of CD24/11) for generic residential development scenarios (set out in paragraph 4.12 of CD24/11). This included a small scale residential development scenario of 2 units and a medium scale residential development scenario of 10 units. The affordable assumptions were applied to all residential scenario testing. For the smaller unit number tests the proportional and tenure splits result in fractions of unit numbers. In these cases the discounts may be considered to equate to the impact of off-site contributions. (CD24/11 - paragraph 4.6). The results of the viability testing are set out in Chapter 5 of the Adur Whole Plan Viability & Community Infrastructure Levy Viability Assessment 2017 (CD24/11). This demonstrates that all residential development is economically viable and deliverable taking account of all policy impacts of the Local Plan.
- 3.11.21 When setting targets for the delivery of affordable housing from new development, the Council considers that the most pragmatic approach is to require that all suitable new development provide a viable and deliverable proportion of affordable housing or, where appropriate, an equivalent financial contribution.
- 3.11.22 Changes to the planning system in recent years have narrowed the opportunities to seek affordable housing contributions. The introduction of the Vacant Building Credit (2016) will reduce the level of affordable housing contribution that can be sought, as such contributions will only be required for any net increase in floorspace over vacant building floorspace lost.

Similarly, relaxations to Permitted Development provision allows business uses to convert to housing without the need for any affordable housing.

- 3.11.23 The Council notes the PPG; however given the high level of need for affordable housing, the significant contribution made by small sites to Adur's housing supply, and supported by viability and deliverability evidence, the Council considers it is justified in seeking to require all new residential development to make provision for affordable housing.

Starter Homes

- 3.11.24 REP 026-001 (Turley on behalf of Persimmon Homes) makes reference to the Housing and Planning Act 2016 which included primary legislation for Starter Homes. As it is anticipated that Starter Homes will be recognised as a form of affordable housing in the new Housing White Paper. The response states that specific reference to them should be included in Policy 22.
- 3.11.25 The Housing and Planning Act 2016 (CD01/19) includes primary legislation for Starter Homes. It outlines the framework within which Starter Homes will be delivered but the details will be set via regulations. The DCLG published "Starter Homes Regulations: Technical Consultation" in March 2016 (CD01/21) and the forthcoming Housing White Paper (not published at the time of writing) is anticipated to provide detail on the future policy and legislative approach to starter homes.
- 3.11.26 It is acknowledged that Policy 22 makes no reference to emerging national policy on 'Starter Homes'; this is due to the lack of specific detail at this time. However, the Adur Whole Plan & Community Infrastructure Levy Viability Assessment 2017 (CD24/11), has tested the policy target of 30% affordable housing delivery assessing the impact of different affordable housing tenure mixes including the introduction of starter homes for a number of residential development scenarios.
- 3.11.27 In addition, the Objectively Assessed Housing Need Update 2016 (CD08/1 - Chapter 4) also considers the need for different types of homes, including Starter Homes. As the Government has not yet set out an approach to quantifying the need for starter homes, the need has been modelled on an approach consistent to that used for other types of affordable housing. It concludes that, as it is currently the Government's pledge to deliver 200,000 Starter Homes by 2020, the analysis looks at meeting the current need over five years. There is a potential need of around 55 Starter Homes per annum.

- 3.11.28 At this point in time, these two pieces of work can only be based on assumptions regarding Starter Homes; however this approach clearly indicates that the Council is taking a proactive approach to the consideration of delivery of this form of housing.
- 3.11.29 The Council is therefore well placed to address the need for Starter Homes once the Government's detailed approach is published in the forthcoming White Paper and secondary legislation if required. If, during the examination of the Adur Local Plan, the White Paper is published, firming up the Government's detailed approach to provision of Starter Homes, the Council will consider any appropriate modification to Policy 22.

Conclusion

- 3.11.30 The Council considers that appropriate provision for affordable housing has been made in accordance with national policy. In a district unable to meet its full objectively assessed housing needs, the Council has made every effort to maximise housing delivery, including for affordable housing. It has demonstrated a proactive approach by seeking to introduce a 'sliding scale' to ensure contributions/delivery of much needed affordable homes on smaller sites. The Council considers that it is justified in taking this approach. The viability of the percentages set out in Policy 22 has been tested and the Council is confident that it will not deter sites from coming forward and delivering affordable housing.

3.12 Is the preferred mix of tenure (as set out in policy 22) viable, deliverable and justified?

- 3.12.1 The Council considers that the preferred tenure mix of 75% social affordable housing and 25% intermediate housing as set out in Policy 22 is viable, deliverable and justified. It is based on up-to-date evidence of affordable housing need for different tenure types together with viability evidence. The Submission Adur Local Plan 2016 (CD07/1 contains updated paragraphs 4.40A, and 4.40C (CD-07/4 - MM40 and MM41) which reflect the updated evidence in the Objectively Assessed Housing Need Update 2016 (CD08/1).
- 3.12.2. REP 71 (Home Builders Federation) comments that Policy 22 should reflect what has been modelled in the Adur Whole Plan and CIL Viability Assessment (2014).
- 3.12.3 REP 026-001 (Turley on behalf of Persimmon Homes) states that as this need is based on a district wide requirement, the policy should provide

some flexibility over tenure to allow individual developments to provide a mix of tenure that is appropriate to the location, type and form of housing being provided alongside the timing of any delivery. This would ensure that the policy would accord with the requirements of the NPPF (paragraph 182) in that it could be both justified and effective.

- 3.12.4 REP 20-38-001 (DMH Stallard on behalf of New Monks Farm Development Limited) states that the tenure mix is unsound and the policy itself should be viability tested as it is inappropriate to set unachievable policy obligations. It suggests that, given the imminent Housing Bill, it would be sensible to remove the tenure split from the policy to ensure the policy remains flexible and relevant in the future. It goes on to suggest that, if a tenure split is considered necessary, in order to allow enhanced viability and a balanced approach to delivery, the policy should allow a 50/50 split between intermediate and affordable rent. No evidence has been put forward by the site promoter to justify this tenure split.
- 3.12.5 In response to these points, it is not yet clear what amendments will be proposed in the forthcoming Government announcements and when they would come into force. The Council's position is that it needs to maximise opportunities to deliver affordable housing which meets identified needs. The preferred tenure mix in the policy is intended to provide a starting point for negotiation on individual sites and is based on current evidence of need. Paragraph 4.42 of the Submission Adur Local Plan 2016 (CD07/1) states that "the Council will use up-to-date information from the Housing Register to negotiate the provision of affordable housing required, taking into account the development and site in question". This is reflected in Policy 22 which specifically states that "on individual sites, the preferred affordable housing mix will be determined through negotiation, taking account of up-to-date assessments and the characteristics of the area" - therefore providing the flexibility sought by response 026-001.
- 3.12.6 The evidence for the need for different types of affordable housing is discussed in the Objectively Assessed Need for Housing: Adur District Report 2015 (CD08/2 - paragraphs 5.41 - 5.50 and Table 34). It takes into account what local households can afford, together with the supply and turnover of existing affordable housing. It suggests that there is a degree of overlap between different affordable housing tenures, with both affordable rented and social rented housing likely to be targeted at the same group of households. Taking the gross number for housing need and comparing this against the supply from relets of existing stock, the analysis suggests that around one quarter of new housing could be intermediate housing with the remaining being either for social or affordable rent.

- 3.12.7 The viability of the preferred tenure mix is evidenced in the most recent iteration of the Whole Plan & Community Infrastructure Levy Viability Assessment 2017 (CD24/11) which concludes that, in general, the housing development proposed in the Local Plan is viable and can accommodate significant CIL charges whilst maintaining the Council's affordable housing aspirations. Five generic residential scenarios reflecting the types and scale of development that might emerge over the Plan period were tested (paragraph 4.12 of CD24/11) A range of residential viability tests was undertaken based on the policy target of 30% affordable housing delivery but testing alternative tenure mix options (see para 4.5 for all of the residential development scenarios. The viability appraisal results are set out in Chapter 5 of the Whole Plan & Community Infrastructure Levy Viability Assessment 2017 (CD24/11) which concludes that all residential scenarios and tenure splits are economically viable and deliverable taking account of all policy impacts.
- 3.12.8 The delivery of the strategic sites is key to the delivery of the overall development strategy in Adur. The impact of the site specific infrastructure requirements of these sites was tested by individual viability appraisals which concluded that:
- Land at West Sompting - demonstrated positive viability including the ability to meet full policy impacts, including affordable housing targets, S106 infrastructure contributions and CIL.
 - New Monks Farm - broadly deliverable taking account of full plan policy impacts, enabling affordable housing and S106 infrastructure contributions to be delivered but there is insufficient additional margin to accommodate significant CIL charges.
 - Shoreham Harbour Broad Location (Western Harbour Arm) - given the abnormal development costs, the overall deliverability of the Western Harbour Arm taking account of full policy requirements is likely to be viable if a Zero CIL rate is applied.
- 3.12.9 The detailed evidence can be found in the Whole Plan & Community Infrastructure Levy Viability Assessment 2017 (CD24/11).

Conclusion

- 3.12.10 The Council considers that the preferred tenure mix of 75% social/affordable rented housing and 25% intermediate housing is considered to be viable, deliverable and justified. It has been based on evidence in the Objectively Assessed Need for Housing: Adur District

Report 2015 (CD08/2) and extensively tested through the Whole Plan & Community Infrastructure Levy Viability Assessment 2017 (CD24/11) which has illustrated that, in general terms, housing development proposed in the Plan in all locations in the local plan area is viable.

3.13 Is the proposed minimum density of 35 dwellings per hectare reasonable and justified (policy 23)?

3.13.1 The National Planning Policy Framework (NPPF) allows local planning authorities to set their own density targets and it is considered appropriate that the Local Plan should contain a density policy (CD1/01 - paragraph 47).

3.13.2 Given the physical and environmental constraints in Adur, land suitable for development is a scarce resource. There are competing demands for its use and it is important that the limited amount of previously developed land is used efficiently when considering proposals for new residential development.

3.13.3 Evidence of existing density of development covering areas with different development characteristics, the density of large developments in Adur over the past 8 years together with data collated by West Sussex County Council has been used to justify setting a minimum density of 35 dph for development in Adur. Policy 23 does however, recognise that there may be exceptional cases where a lower density might be more appropriate, for example in Conservation Areas, where applying the minimum density might result in an unacceptable impact on the character of the area.

A sample of densities within the existing built-up area of Adur

3.13.4 The densities of several sample areas from within the built up area was used to calculate the average density of development in Adur. The areas were chosen as a representative sample of the overall character of Adur, including Conservation Areas and areas where particular house types dominate.

Table 1: Sample of densities from within the existing built up area

Location	Hectares	Total units	dph	Description
North Sompting	7.8	165	21	Semi-detached houses and

				bungalows
Addison Close, Lancing	2.4	88	36.6	Semi-detached/terraced houses
Mash Barn, Lancing	7.4	260	35	Terraced houses and flats
North Lancing Conservation Area	9.76	140	14.3	Detached properties
Ullswater Road/Western Road, Sompting	3.35	69	20.6	Bungalows
Central Lancing	4.38	120	27.4	Detached/semi-detached/terraced houses and flats
Hasler Estate, Lancing	8.3	227	27.4	Semi-detached houses and bungalows
Shoreham Beach (west)	6.5	131	20.2	Detached properties and flats
Shoreham Beach (east)	9.5	161	17	Detached/semi-detached/terraced properties
Central Shoreham	6.0	150	25	Semi-detached properties
North A270, Shoreham	9.8	223	23	Detached/semi-detached properties
North Shoreham Conservation Area	5.24	61	12	Detached properties
Mile Oak, Southwick	9.4	232	25	Detached/semi-detached properties
Central Southwick	10.8	228	21	Semi-detached properties
Total	100.63	2255	325.5	

3.13.5 The average density of development in Adur is 22.4 dwellings per hectare.

West Sussex County Council Monitoring Information

3.13.6 West Sussex County Council produces annual housing monitoring information for Adur. Density of new development over the last 9 years (2007-2016) has been calculated. Table 2 indicates that sites of 1 to 9 dwellings have an average density of 53.4 dph, with larger sites of 10+ dwellings having a higher density of 66.9dph. Overall, new development averages 60.2 dph and reflects the efficient use of land and the fact that more flats have been built in recent years. This may in part be a response to previous policy guidance in the South East Plan (now revoked) which set a target of 40 dph and the nature of the sites coming forward. The development industry's response to market conditions and the buoyant buy to let market may have also influenced the increased number of flats delivered in more recent years.

Table 2: Density of Development

Monitoring Year	No. of Sites (1-9 units)	Average density	No. of Sites (10+ units)	Average density	No. of Sites (all units)	Average density
2007/2008	19 (37)	28.5	4 (122)	61.9	23 (159)	48.6
2008/2009	26 (58)	48.3	7 (76)	78.9	33 (134)	62.0
2009/2010	12 (22)	44.9	5 (70)	67.7	17 (92)	60.4
2010/2011	25 (52)	59.8	5 (36)	83.9	30 (88)	67.7
2011/2012	23 (57)	64.0	8 (147)	85.3	31 (204)	78.1
2012/2013	28 (50)	56.2	9 (108)	56.7	37 (158)	56.5
2013/2014	15 (26)	62.4	4 (77)	57.2	19 (103)	58.4
2014/2015	23 (64)	57.3	5 (42)	43.7	28 (106)	51.0
2015/2016	22 (38)	58.9	0 (0)	0 (0)	22 (38)	58.9
Average		53.4		66.9		60.2

Larger developments completed/currently under construction since 2008

3.13.7 Looking more specifically at examples of individual large sites of six or more dwellings that have been completed or are currently under construction since 2008, Table 3 below indicates that the average density is 68 dph.

3.13.8 The higher development densities are not necessarily all in town centres as might be expected but are located throughout Adur. The majority of the larger sites have been developed with a mix of houses and flats, mainly in response to market demands, the character of the surrounding area and to make the best and most efficient use of land.

Table 3: Examples of large developments completed/currently under construction since 2008

Site location	Ha	Dwellings (net)	dph	Description
Sussex Wharf, Shoreham Beach	3.67	235	84	Mix of flats and houses
Shadwells Road, Lancing	0.10	6	55	2 and 3 bed houses
Kingston Works, Gardner Road, Southwick (now The Ledge)	0.4	40	100	Mix of 2 bed flats and 3 bed houses
St Giles Centre, Elm Grove, Lancing	0.18	26	144	Mix of 2, 3 bed houses, 2 bed bungalows and 2 bed flats.
Land west of Penncroft, Elm Grove, Lancing	0.06	6	105	Mix of bedsits and 1 bed flat
Royal Naval Association, Tower Road, Lancing	0.07	9	129	1 and 2 bed flats
Burdwood House, Brighton Road, Lancing	0.21	20	95	1, 2, 3 bed flats and 1 bed bungalows

Ballamys, Ropetackle, Shoreham	0.21	48	229	1, 2, 3 bed flats
Former Dairy, 96 Southview Road, Southwick	0.21	14	67	Flats
Elmcroft, Croft Avenue, Southwick	0.18	14	78	Flats
Southlands Hospital, Upper Shoreham Road, Shoreham	3.74	199	53	Mix of 1, 2, 3, 4 bed houses and flats, including conversion of existing buildings.
Land north of The Globe School, Irene Avenue, Lancing	0.63	23	35.5	1, 2, 3, 4 bed houses.
The Ball Tree, Busticle Lane, Sompting	0.24	10	42	Mix of 2, 3, 4 bed houses and 3 bed bungalow.
82 Underdown Road/ Southview Road, Southwick	0.27	13	48	2 and 3 bed houses
136 Upper Shoreham Road, Shoreham	0.28	16	57	3 bed houses
Norfolk House, High Street, Shoreham	0.16	9	56	3 bed houses
79/81 Brighton Road, Shoreham (under construction)	0.7	132	189	Mix of 1, 2 and 3 bed flats
Southlands Hospital, Upper Shoreham Road, Shoreham (under construction)	2.19	106	48	Mix of 2,3,4 bed houses and 1,2,3 bed flats
Total	13.5	926		

3.13.9 The average density of large development completed/under construction since 2008 is 68.6 dph.

- 3.13.10 In assessing planning applications for new residential development, the Council applies its adopted Supplementary Planning Guidance “Development Control Standard “Space Around New Dwellings and Flats” (CD18/1) (Use of this document was supported by a recent appeal decision APP/Y3805/W/16/3153842). Sufficient external space around and between new homes is important in creating a pleasant residential environment, contributing to the character of the area and ensuring adequate privacy and daylight to both existing and proposed new dwellings. This has been taken into account in setting an appropriate minimum density.
- 3.13.11 REP 034-001 - (ECE on behalf of Cobbetts Developments Limited) and REP 017-001 (ECE on behalf of Landstone Ltd) both consider that the minimum density should only apply to the residential elements of a site. Otherwise, sites required to deliver large areas of non-developable areas (such as open space, schools, SuDS etc) will be delivering housing at a much greater density on their developable area.
- 3.13.12 When assessing planning applications, the density is calculated on the residential elements of the site. Whilst this may include small areas of open space etc. within the development itself, incidental to the use of the development, it would exclude any significant open space or other uses proposed on the site.

Conclusion

- 3.13.13 It is concluded that the proposed minimum density is reasonable and justified. In setting a minimum target density for Adur, the above evidence was taken into account. It is considered that requiring new development to have a minimum density of 35 dwellings per hectare (dph) is appropriate. This takes into account the current average density of the built up area (22.4 dph) and the average density of new development since 2008 (68.6 dph). It also sets a realistic minimum density requirement for the proposed strategic allocations at New Monks Farm and West Sompting (CD07/1 - Policy 5 and 6) given their sensitive locations on the edge of settlements and associated landscape issues.

3.14 Is the Council providing sufficient support for people wishing to build their own homes?

- 3.14.1 The National Planning Policy Framework (CD1/01) at paragraph 50 states that, to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities,

local planning authorities should plan for people wishing to build their own homes.

- 3.14.2 Planning Practice Guidance: Self-build and custom housebuilding register (CD01/2), requires that the local authority keeps a self-build and custom housebuilding register for individuals and associations of individuals who are seeking to acquire serviced plots of land to build their own home. Since 1st April 2016 the Council has maintained a register for people wishing to build their own homes in accordance with its statutory duty under the Self-build and Custom Housebuilding Act 2015. This joint Adur & Worthing Councils Register is available on the Council's website for both individuals and associations of individuals to provide relevant information on their plot requirements to the local authority.
- 3.14.3 As at 5th December 2016, of the 50 individuals/association of individuals on the register, 20 have specifically requested a plot in Adur and 22 have requested a plot in either Adur or Worthing. This is reported in the Council's Annual Monitoring Report (CD21/2).
- 3.14.4 The Housing and Planning Act 2016 (CD01/19) places a duty on local planning authorities to grant suitable development permission in respect of enough serviced plots of land to match demand. Adur District Council does not have significant land holdings and the Council is unable, at this stage, to identify any sites that could be made available for those seeking to build their own dwelling. However, it is being proactive in its search for available land by undertaking a review of all of its land and property holdings. This Strategic Asset Review has commenced and to date has identified a number of small sites, which are potentially suitable for residential development. However, the majority of these sites are on land held by the Housing Revenue Account (HRA) and the priority is to deliver additional affordable housing to meet the significant level of unmet affordable housing need in Adur, with 633 people currently on the waiting list (2015). These sites are to be considered as part of a comprehensive Neighbourhood Review Programme and the Council is investigating setting up a Housing Company to deliver its renewal programme. To assist this programme, the Council has recently been awarded £227,000 from the Shared Ownership and Affordable Housing Programme (HCA) to deliver additional affordable housing.
- 3.14.5 The ongoing Strategic Asset Review has identified one site within Council ownership (Adur Civic Centre) which is more appropriate for a high density residential led mixed use development, given its town centre location and the need to maximise the number of homes to be delivered (to contribute

towards meeting the objectively assessed need as far as possible) but also to achieve best value for the site.

- 3.14.6 The Council's Strategic Housing Land Availability Assessment (CD07/24) assesses the potential of sites to deliver housing development. However, this assessment only considers sites that could have the potential to deliver 6 or more dwellings. The Council does not collate or promote a list of sites specifically for self-build projects. However, the majority of people currently on the self-build register are requesting a single plot. Much of the housing delivered in Adur is on sites of five dwellings or less (see response to question 3.11 for more detail), which would be suitable for people wishing to build their own home. The Council makes available on its website, information on sites both where an application has been made for residential development and where consent has been granted.
- 3.14.7 Given this, the Council does not consider that it is necessary to make specific provision for self-build housing in the Local Plan, either as a general policy requirement or through the proposed site allocations/broad location (Policies 5, 6 and 8). This latter point is supported in REP 20-38-001 (DMH Stallard on behalf of New Monks Farm Development Limited) which considers that it is not appropriate to stipulate a part of a major application for self-build for reasons of delivery, viability, design co-ordination and health and safety. Small sites of 1-5 dwellings are considered to be the best location for self-build.
- 3.14.8 The plans for the proposed strategic allocations at New Monks Farm (Policy 5) and West Sompting (Policy 6) have been developed over a number of years and the need to provide self-build plots may not have been factored into viability calculations. Whilst site promoters have been advised of the need for self-build plots, there has been no interest in a separate land disposal for self-build projects.

Conclusion

- 3.14.9 The Council is aware that the Government is seeking to increase the supply of housing through self-build housing schemes. If the Inspector considers that reference to self-build is necessary to make the Local Plan sound, then the Council would have no objection to considering a modification to the relevant housing policy.
- 3.15 Is the plan based on up-to-date and reliable evidence of the needs of Gypsies, Travellers and Travelling Showpeople, and does it make deliverable provision to meet such needs (policy 24)? Are all the requirements of policy 24 reasonable and justified?**

Is the plan based on up-to-date and reliable evidence of the needs of Gypsies, Travellers and Travelling Showpeople?

- 3.15.1 A Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (GTAA) (Phase 1) was undertaken by consultants Peter Brett Associates together with Opinion Research Services on behalf of the Coastal West Sussex Authorities (Adur, Arun, Chichester and Worthing) together with the South Downs National Park Authority and with support from West Sussex County Council, to identify accommodation needs for the period 2012-2027. This document was published in April 2013 (CD09/6).
- 3.15.2 The full methodology for the Study is set out in paras 1.25 – 1.36 of the GTAA (Phase 1) (CD09/6). To summarise, the study sought to provide an evidence base to enable the commissioning authorities to comply with their requirements towards Gypsies and Travellers and Travelling Showpeople under the Housing Act 2004, the National Planning Policy Framework 2012 and Planning Policy for Traveller Sites 2012 (this was the guidance in place at the time the GTAA was prepared; it has since been replaced by “Planning policy for traveller sites” published in August 2015 CLG) (CD01/18). The main objective of this study was to provide the Councils with robust, defensible and up-to-date evidence about the accommodation needs of Gypsies and Travellers and Travelling Showpeople in the Coastal West Sussex authorities during the period until 2027.
- 3.15.3 Prior to the commissioning of consultants, the Coastal West Sussex authorities had consulted relevant stakeholder groups, including those representing the Gypsy and Traveller community on the project brief, and had contacted by letter (in many cases hand delivered) the residents of all known authorised and unauthorised Gypsy and Traveller sites, Travelling Showpeople households and those Gypsies and Travellers known to be residing in bricks and mortar to make them aware of the study and request that they take part in the survey. The West Sussex Education Service was used to help identify other households in bricks and mortar in advance of the survey and to make them aware of the importance of taking part in the survey. It is clear that every effort was made to interview all known Gypsy and Traveller households, with visits made during August/ September and November 2012.
- 3.15.4 Adur has one public Gypsy and Travellers site located at Withy Patch in Lancing (with 12 pitches) and no unauthorised developments or encampments at the time of the survey (or since). In total, 15 interviews were undertaken in Adur; this included the majority of households on Withy Patch. The outcome of the GTAA was that an additional 7 pitches (all on

public sites) were required in Adur over the period 2012-2027. The survey also identified a need for a single plot for Travelling Showpeople.

3.15.5 An Update to the GTAA was subsequently published in December 2014 (CD09/7). This document corrected a number of errors in the original report:

- A small number of sites were attributed to the wrong planning authority. This error did not affect any sites in Adur.
- As part of a separate study (on behalf of Mid Sussex District Council) it became apparent that there was potential over counting of needs from the West Sussex waiting list for pitches on public sites (with some households on the list living outside the area and appearing as a component of other local planning authorities' needs assessments). This was confirmed by the survey of households on the waiting list. The waiting list was revisited for the Coastal West Sussex GTAA, resulting in an amendment to the need for pitches from households on the waiting list.

3.15.6 The amendment to the need from the waiting list resulted in a revised identified need for Adur of four rather than seven additional pitches (all on public sites). This is as a result of new family formation on the Withy Patch site, together with Gypsies and Travellers currently on the waiting list for a pitch. The Council is confident that the additional need for four pitches for Gypsies and Travellers and one plot for Travelling Showpeople in Adur is based on robust and up-to-date evidence.

Does the Plan make deliverable provision to meet such needs (policy 24)?

3.15.7 Phase 2 of the GTAA sought to identify potential sites to meet the identified need in each of the Coastal West Sussex authorities. The methodology, including the site assessment criteria for this study, can be found in Section 2 of the Gypsy, Traveller and Travelling Showpeople Sites Study (September 2013) (CD09/8).

3.15.8 An assessment of existing sites and a search for new sites was undertaken and a workshop was held with key representatives of the Gypsies and Travellers community and other stakeholders, to assist in the identification of suitable sites. No suitable sites were identified in Adur where there are particular constraints due to flood risk and the district being predominantly an urban area with high land values. The study concluded that the Withy Patch site has existing needs for more space, together with future needs from new household formation. The GTAA recommended that

consideration be given to including Gypsies and Travellers site provision within any proposed future large housing allocation if no other suitable sites could be found.

3.15.9 Planning Practice Guidance 'Flood Zone and Coastal Change' classifies mobile homes intended for permanent residential use as highly vulnerable and such development is not permitted in flood zone 3. The current site at Withy Patch falls within flood zone 3 and therefore it cannot be extended to accommodate the additional pitches in its current location unless appropriate mitigation is able to lift the site out of this flood zone.

3.15.10 Having considered the findings of Phase 2 of the GTAA report, it was clear that no suitable sites could be identified to accommodate the additional 4 pitches required for Gypsies and Travellers or a plot for Travelling Showpeople.

Accommodating the additional need at New Monks Farm strategic allocation (Policy 5)

3.15.11 The intention of Policy 24 is to provide the criteria against which any planning application for Gypsy and Traveller provision will be assessed. It is Policy 5: New Monks Farm, Lancing, that will deliver the identified need. Policy 24 can therefore be used to assess any planning application for such development.

3.15.12 The existing site at Withy Patch is located immediately south of the A27 and adjacent to the proposed strategic allocation at New Monks Farm (Policy 5). To deliver this strategic allocation, a new road junction is required which would necessitate the relocation of the Withy Patch site. As part of the master planning process, the promoters of the New Monks Farm development (New Monks Farm Development Limited) have identified a new location, within their site boundary, on which they propose to construct a replacement for the Withy Patch site. This proposed new site will be of sufficient size to allow the relocation of existing Withy Patch residents together with an additional area of land to accommodate the required need for the additional four pitches for Gypsies and Travellers. Prior to the construction of the site the land will be raised to take it out of flood zone 3.

3.15.13 Adur District Council is working with New Monks Farm Development Limited, West Sussex County Council, the site management company, the Gypsies and Travellers community and their representatives together with other relevant stakeholders to ensure that the identified site is in a suitable location. This is in accordance with Policy G (paragraph 21) of 'Planning policy for travellers sites' (DCLG August 2015) (CD01/18).

- 3.15.14 REP 20-38-001 (DMH Stallard on behalf of New Monks Farm Development Ltd) in paragraph 4.13 confirms that the proposed strategic allocation at New Monks Farm can accommodate the additional 4 pitches within the site. The proposed new Gypsies and Travellers site will have significant benefits for both the existing and new residents. It will be increased in size to accommodate the need for an additional four pitches (therefore meeting all the need for Gypsies and Travellers identified in the GTAA apart from the Travelling Showpeople plot requirement); be connected to the mains drainage, water and electricity services; benefit from the new flood defences, improved ground water drainage strategy and be higher than predicted flood levels in the area, and have access to new local playgrounds via safe footpaths. New Monks Farm Development Limited intends to construct the site in the first phase of the wider scheme, potentially commencing in November 2017. (Rep 20-38-001 paragraph 5.9).
- 3.15.15 The Council is confident that sufficient provision to meet the identified need for additional pitches for Gypsies and Travellers is being made and will be delivered through the strategic allocation at New Monks Farm. The Council has been unable to identify a plot to accommodate the requirement of one plot for Travelling Showpeople. It is being proactive in its search for a suitable site and the Council's Economic Development Officers are aware of the need.
- 3.15.16 If, due to unforeseen circumstances, the New Monks Farm allocation does not come forward as anticipated, Adur Council would look to its neighbouring authorities to help meet provision through the Duty to Co-operate. In addition, the Council will continue to work with the site owner (West Sussex County Council) to look towards improving the existing Withy Patch site, providing improved flood protection and opportunities to expand the existing site if possible. This is likely to require external funding bids.

Are all the requirements of Policy 24 reasonable and justified?

- 3.15.17 Phase 2 of the GTAA (paragraph 7.4)(CD09/8) contains a model policy which includes criteria against which planning applications for Gypsy, Traveller and Travelling Showpeople sites can be assessed. Policy 24 is based on these criteria and has also taken account of advice in paragraph 13 of 'Planning Policy for Travellers Sites' (DCLG August 2015) (CD01/18).
- 3.15.18 It is considered that all of the requirements of Policy 24 are reasonable and justified and provide criteria against which to assess planning applications

for new sites which will ensure that any proposed site is sustainable economically, socially and environmentally.

Conclusion

- 3.15.19 The Council is confident that the Plan is based on up-to-date and reliable evidence of the needs of Gypsies, Travellers and Travelling Showpeople in Adur. The additional need for four pitches identified in the GTAA Update 2014 will be provided as part of the proposed strategic allocation at New Monks Farm (Policy 5) which will both necessitate and facilitate the relocation of the existing Gypsies and Travellers site at Withy Patch.